



**ESG Report
of Bank Millennium
and
the Bank Millennium
Group for 2023**

This document is not the official version of the ESG Report of Bank Millennium and the Bank Millennium Group for 2023. Official ESG Report of Bank Millennium and the Bank Millennium Group for 2023 was prepared in accordance with the ESEF requirements. This document is a translation from the original Polish version. In case of any discrepancies between the Polish and English versions, the Polish version shall prevail.

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LETTER FROM THE CHAIRMAN OF THE MANAGEMENT BOARD

[GRI 2-22]

Ladies and Gentlemen,

It is once again my pleasure to be able to convey to you the ESG Report published by Bank Millennium SA and the Bank Millennium Group.

Every year we continue to delve more deeply into the various aspects of ESG. As we gain more knowledge and experience in this area, we see that each one of the groups of topics forming an integral part of ESG (environment, society and governance) is of extremely great significance in running a sustainable business.

We actively pursue activities to foster sustainable development in the sundry aspects of our business activities and in all of the many relationships with our stakeholders. Our business and ESG goals form a coherent whole. One of the most important aspects of our efforts is the fact that we are engaged in pursuing them together as the Bank Millennium Group. We act jointly with our stakeholders: employees, clients, business partners and shareholders.

By acting together, we are able to implement our business and sustainable development goals concurrently. By combining our efforts, we achieve more than success in business, which is widely appreciated by our stakeholders, as evidenced by our victory in both categories of Newsweek's Friendly Bank ranking. By combining our forces, we are able to back values we consider to be important. One example is our one-of-a-kind employee volunteerism program called Our People'23: Save the Planet. In the course of this joint sporting effort more than 1.5 thousand employees reached the goal of having Bank Millennium donate PLN 250 thousand to the Bank Millennium Foundation to implement eco initiatives. Employees subsequently completed 26 projects involving eco volunteerism, which was the second phase of this campaign in which they created green spaces and educated and supported local environmentally-friendly undertakings. In 2023 Bank employees devoted more than 12 thousand hours to educational, sporting and environmentally-friendly social initiatives.

We understand that the key condition for the Bank to attain these goals and business success and for our organization to achieve long-term development hinges on employee engagement and satisfaction. We aspire to excellence in this field by turning an attentive ear to what they have to say. The outcome of our employee engagement and satisfaction research conducted in 2023 indicates that the ratios of satisfaction we achieved in this area is above the average seen in the banking sector and also for the entire country. I consider this to be a reason to be proud and glad, but at the same time this factor motivates us to show care for the welfare of our employees on a continuous basis. Our efforts in employee-related issues have also garnered the attention of reputable third parties. In January 2024 we received the Top Employer award, and in 2023 we receive the title of being a Solid Employer for the ninth year in a row.

We pursue our strategic ESG goals on an unwavering basis. In supporting sustainable development, we start with ourselves as an organization. Once again, we have been successful not just in reaching our ambitious goals in terms of cutting emissions, but also in surpassing them. The scope 1 and scope 2 emissions in the Bank Millennium Group in 2023 are down 70% versus 2020.

Notice has once again been taken of our sustainable development efforts in the form of the CSR Golden Leaf awarded by the Polityka weekly, the title of being a Climate Aware Company and the

title of being a European Climate Leader. We also received a distinction from UN Global Compact Network Poland for our involvement in efforts to protect the climate and advance sustainable development.

As we address dynamic economic and social change and ongoing changes to the climate and the needs of our clients related to the business community adapting to these changes, we consistently work on refining our green product offering so as to be able to support companies in running sustainable businesses. We are aware of how important it is to continue expanding and improving our knowledge as an organization and sharing experience with others. That is why we joined the United Nations Global Compact in 2023 and signed the declaration on the 10 Principles of the UN Global Compact. We believe that our membership in the world's largest initiative to advocate for sustainable business serves as a resounding confirmation of the values we espouse as an organization, our commitment and readiness to continue expending effort to achieve sustainable development.

As ESG issues are strategically important, they will have a very prominent place in Bank Millennium's new business strategy for 2025-2027, which we will announce in 2024. We are facing a number of challenges related to the transformation to a zero-emission economy: environmental, social and governance challenges. The world is changing rapidly, frequently in unexpected ways, while the only sure thing is constant change. We will meet these challenges TOGETHER. I am certain of that and that is something we have successfully proven many times as an organization.

I encourage you to peruse our ESG Report.

A handwritten signature in blue ink that reads "Joao Bras Jorge".

Joao Bras Jorge
Chairman of the Management Board of Bank Millennium



1. BANK MILLENNIUM AND THE BANK MILLENNIUM GROUP

1.1. PROFILE OF THE ORGANIZATION

[GRI 2-1] Bank Millennium S.A. (“Bank Millennium”, “Bank”) was established in 1989 as one of the first commercial banks in Poland. It is currently one of the seven largest commercial banks in Poland in terms of assets, directing its services to all market segments through a network of 612 branches (including 374 own branches and 238 franchised branches), networks of individual relationship managers, and electronic and mobile banking.

From the outset of its operations it has been a trendsetter in the Polish banking industry. For instance, it was the first bank listed on the Warsaw Stock Exchange and the issuer of the first payment card on the Polish market. The Bank meets the highest corporate governance standards, it pursues social programs to support the development of culture and youth education.

[GRI 2-6] It offers services to individual clients (in the Retail, Prestige and Private Banking Segments), micro businesses and small, medium and large enterprises in the Corporate Banking segment. By blending the most sophisticated technologies and the best banking traditions Bank Millennium successfully competes in all of the segments of the financial market. The Bank adds its international practice in finance contributed by Banco Comercial Português (Millennium bcp) - one of the largest commercial banks in Portugal and Bank Millennium’s strategic shareholder - to its many years of familiarity with the Polish market. The acquisition of Euro Bank in 2019 was a landmark decision that increased the magnitude of its operations and contributed to its growth.

Bank Millennium is a market leader in innovation defined as new technology solutions and process improvements. Innovation in Bank Millennium is a part of its business strategy. Bank Millennium and its subsidiaries constitute the Bank Millennium Group (“BM Group”, “Group”), one of the most sophisticated and the most comprehensively growing financial groups in Poland.

Bank Millennium and its subsidiaries constitute the Bank Millennium Group - one of the most sophisticated financial groups in Poland. In addition to the Bank, its most important subsidiaries are Millennium Leasing (leasing activity), Millennium TFI (mutual funds) and Millennium Bank Hipoteczny (raising long-term financing through the issuance of covered bonds). Since 2016 Millennium Goodie Spółka z o.o. has been operating an innovative smart shopping platform based on sophisticated technology in collaboration with the Bank. These companies’ offering complements the products and services offered by the Bank. In March 2023, the Bank sold 80% of its shares in Millennium Financial Services sp z o.o. to Towarzystwo Ubezpieczeń na Życie Europa S.A. and Towarzystwo Ubezpieczeń Europa S.A. and became a 20% shareholder in the company. In connection with the sale, the Bank entered into a series of agreements with the buyers regarding the insurance distribution model and long-term cooperation in the bancassurance area.

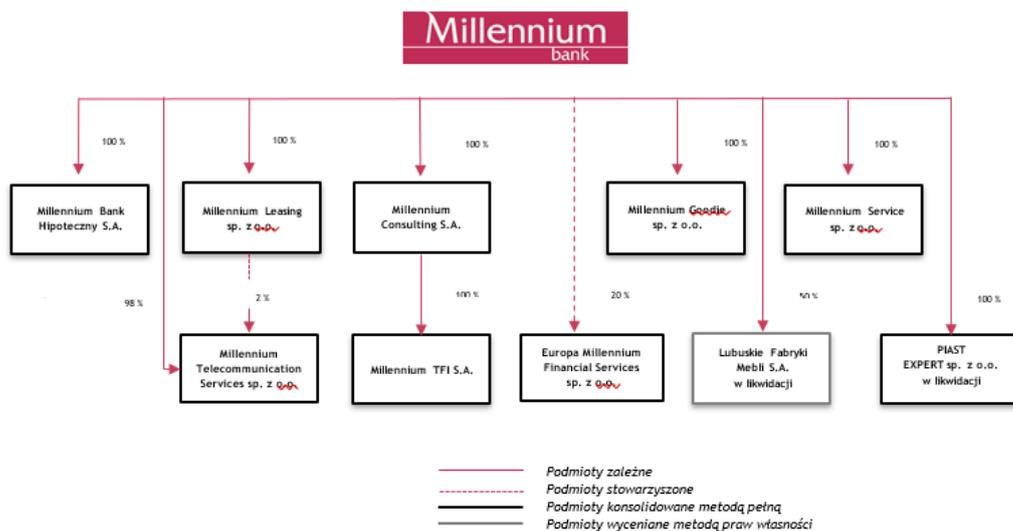
The offering of those subsidiaries complements the services and products offered by the Bank. The Bank Millennium Foundation is also part of the Group. For years it has been supporting financial education and employee volunteerism projects.

[GRI 2-6] Millennium Bank Hipoteczny Spółka Akcyjna launched its operations on 14 June 2021. Its primary goal is to secure long-term financing for the Group by issuing covered bonds whose underlying instruments are the accounts receivable by virtue of the mortgage loans transferred by Bank Millennium S.A. Covered bonds are one of the safest financial instruments in the world. Transferring these accounts receivable and issuance of covered bonds makes it possible to finance mortgage loans using long-term liabilities by successively reducing the mismatch between the maturities of assets and liabilities.

[GRI 2-1] The Bank and its Subsidiaries operate in the Republic of Poland, which is treated as the area of business activity of the Group, therefore all disclosures in the ESG Report refer to Poland. The Group does not identify other locations that are important from the perspective of its business activities. **[GRI 2-1]** The Bank’s Head Office is located in Warsaw while some of its head office functions are also performed in Gdańsk and Wrocław.

[GRI 2-1] Organizational chart of the Bank Millennium Group (as at 31 December 2023)

Podmioty zależne i stowarzyszone



1.1.1. SCALE OF OPERATIONS

[GRI 2-6] The Bank operates throughout Poland and has no branches outside of its borders. Total assets of the Group amount to PLN 125,5 billion. The Bank Millennium Group serves over 3.0 million active retail clients, including 2.7 million of internet and mobile clients. At the end of 2023, the Bank had 612 branches (including 374 own branches and 238 outlets in the franchise model) and 506 ATMs.

Scale of the Bank Millennium Group's business activity	2023	2022	2021	2020	2019
Number of active retail clients (thous.)	3,003	2,887	2, 694	2,633	2,571
Number of own and franchise branches	612	635	655	702	830
Number of ATMs	506	509	480	479	498
Number of employees (persons)	6,872	6,987	7,079	7,645	8,615

Share in key market segments



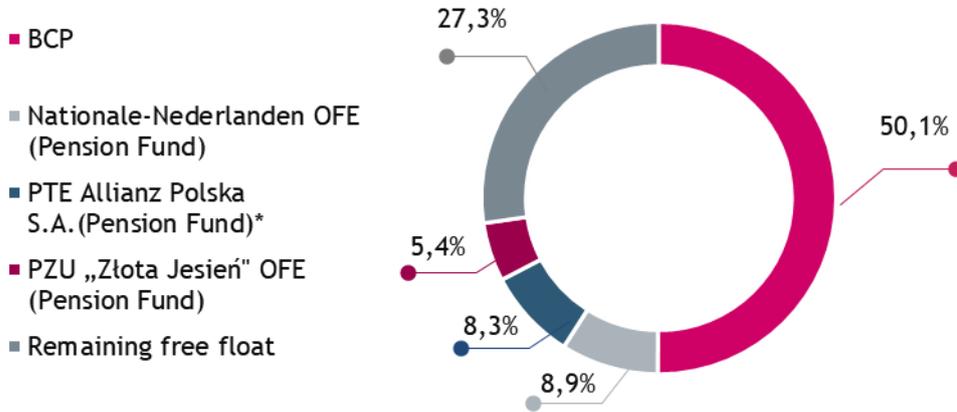
1.1.2. SHAREHOLDERS

Bank Millennium is a joint stock company that has been listed on the Warsaw Stock Exchange since 1992. Presently, the Bank is a member of the WIG, WIG 30, mWIG 40, WIG Banks and the WIG-ESG indices.

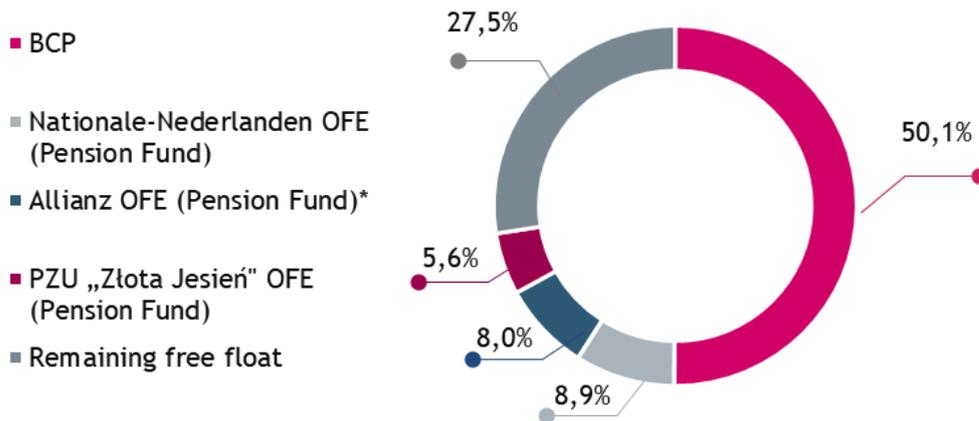
Bank Millennium’s strategic shareholder is Banco Comercial Português, the largest private bank in Portugal, which holds a 50.1% stake in Bank Millennium. OFE Nationale-Nederlanden, PTE Allianz Polska S.A., and also OFE PZU „Złota Jesień” are significant shareholders, each holding more than 5% of the share capital.

Bank Millennium’s shareholder structure

Bank Millennium shareholders’ structure (31.12.2023)



Bank Millennium shareholders’ structure (31.12.2022)



1.1.3. ECONOMIC PERFORMANCE

The Bank Millennium Group achieves its economic goals striving to balance the needs of the key Shareholders, in accordance with its growth strategy, taking into account the principles declared in the Code of Ethics.

[GRI 201-1] Selected economic results (PLN million)	Bank Millennium Group		Bank Millennium	
	2023	2022	2023	2022
Operating income	6,723	4,009	6,522	3,860
Operating expenses*	(1,993)	(2,093)	(1,921)	(2,020)
Cost/income ratio	29.6%	39.3%	29.4%	52.3%
Impairment provisions and other cost of risk***	(352)	(460)	(311)	(418)
FX legal risk related provisions	(3,065)	(2,017)	(3,065)	(2,017)
Banking tax	-	(169)	-	(169)
Corporate income tax (CIT)	(737)	(284)	(715)	(265)
Net loans and borrowings to clients	73,643	76,565	72,405	75,856
Client deposits	107,246	98,039	107,506	98,265
Common Equity Tier 1 capital (CET1=T1)	14.7%	11.3%	15.4%	11.4%
Total Capital Ratio (TCR)	18.1%	14.4%	19.0%	14.5%
Reported net income	576	(1,015)	510	(1,030)
Adjusted net income (excl. extraordinary items)**	2,993	2,239	-	-
Reported Return on Equity (ROE)	9.1%	(17.5%)	-	-
Adjusted Return on Equity (ROE) (excl. extraordinary items)**	21.7%	21.5%**	-	-

* without impairment charges for financial and non-financial assets

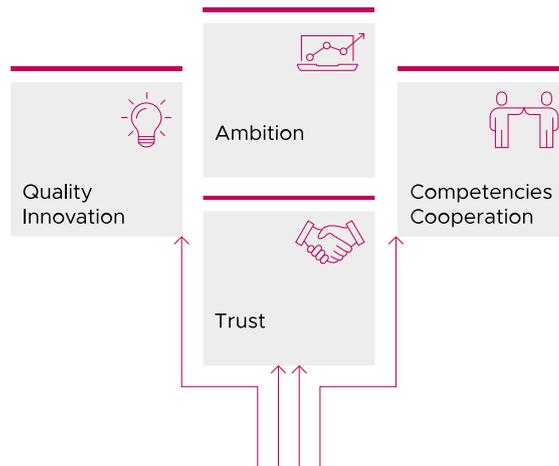
** adjusted net result and ROE - excluding extraordinary items relating to costs related to foreign currency mortgage loans (costs of provisions for legal risk, costs of settlements and legal costs), costs related to credit holidays and revenues from the sale of shares in Millennium Financial Services sp. z o.o. to an external insurance partner. z o. o. in March 2023 with the associated effects, but with a hypothetical banking tax in the second half-year of 2022 and in 2023

*** the item includes impairment losses on financial and non-financial assets, including loan adjustments according to fair value, and the effect of loan modifications

1.2. MISSION AND VALUES

The Bank’s mission is to support its clients in the achievement of financial success now and in the future. The Bank builds its competitive advantage on values forming the basis for running its business.

The Bank Millennium Group’s Values



We build relationships based on trust

We can rely on one another, and in the course of developing and pursuing ambitious goals, we keep ethics and our associates in mind. Responsibility, respect, support and understanding cement our community and help us strengthen our leadership position among the best banks in Poland. We build trust in the Bank by serving as its ambassadors.

Quality and innovation are our passion

We set the standards of perfection and create trends in banking. Openness, enthusiasm, searching for the best solutions and breaking barriers are embedded in our thinking, actions, products, services and processes as well as in our relations with the outside world and within the organization.

We develop employees and we promote cooperation

In our organizational culture, goals and successes are achieved through mutual inspiration, exchange of competence and experience. We discover and reward people who through their actions motivate others to be their very best.

We always aim higher

When others achieve the peak of their capabilities, we want more. We develop and increase the employees’ and the teams’ competences through training and certification programs. We carefully observe our surroundings, we perfect and evolve, and we actively respond to the challenges of the future.

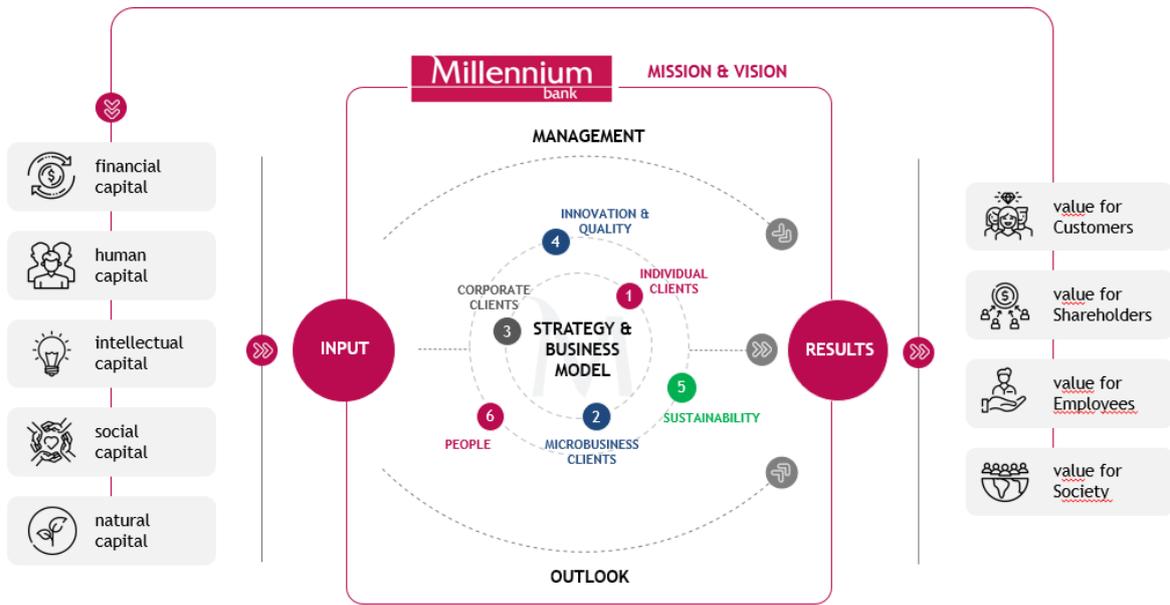
1.3. BUSINESS MODEL AND THE VALUE CREATION MODEL

Business model

Bank Millennium operates according to a business model centered on six pillars:

- Top quality and extended offering for individual clients - we are continuously strengthening the range of financial services offered to Customers, aiming also to constantly offer the best-in-class Customer Experience in all the channels, what makes us one of the fastest growing banks in loyal individual customers
- Bank of the 1st choice for new micro-business clients - taking advantage of the well-established retail sales and service model, we are building high innovative and efficient model for micro businesses
- Strategic partner supporting corporate clients development - we are developing corporate banking segment leveraging on long-term partnerships providing to our clients personalized and digitalized services, as well as professional expertise to address challenges of the future, i.e. green transformation
- Services supported by innovative solutions with top notch User Experience in digital channels (mobile-first approach) - we are among digital banking leaders, with one of the highest levels of mobile banking application penetration, setting trends in innovative financial and non-financial (Value Added Services) solutions and taking care on the best possible User Experience, hiper-personalization and cybersecurity
- Sustainable organization on the climate neutrality path -we keep our engagement for environment and society, now even scaled by dedicated strategy with defined ESG goals
- Great place to work for our people and for top talents - cornerstone of the business model and competitive advantage are our people and organizational culture, what is the reason behind continues effort to make us top employer, not only in the banking sector

The firm's values form the foundation of our business model: building relations based on trust, a passion for quality and innovation, employee development and promoting collaboration and the ever constant ambition to aim higher.



Value creation model

The Bank Millennium Group’s capital poises it to grow its business as it simultaneously creates value for its Stakeholders.

Capital in the Bank Millennium Group...



FINANCIAL CAPITAL

Liabilities

PLN 118.6 billion total liabilities

Equity

PLN 6.9 billion own funds

Assets

PLN 125.5 billion total assets



HUMAN CAPITAL

6 872 - employees in the Group

45,8 - average number of training hours per Group employee per year

Friendly workplace, focus on employee development, attention to diversity

M#leaders - innovational training programme for managers and leaders of the Bank

IMPAKT Employee Reward Programme where employees reward their work colleagues



**ORGANIZATIONAL
CAPITAL**

Culture of rapidly responding to change (agility), sophisticated infrastructure and IT systems, digitization and optimization of processes making it possible to develop innovative products and offer high quality services, organization's cost effectiveness

Focus on **growth and innovation**, with full understanding of client needs

29.6% cost/income ratio of the Group

Reduction of resource consumption, consistent implementation of energy-efficient solutions



INTELLECTUAL CAPITAL

Investments in modern technological solutions and innovations, the bulk of IT development is in-house, internal start-up goodie, internal UX Design time

Business Strategy for years 2022-2024 and ESG Strategy

Partnerships with organisations - cooperation with UNGC within Climate Positive Programme, cooperation with WWF Poland

Strategic partnerships with universities - Szkoła Główna Handlowa, Uniwersytet SWPS, Akademia Leona Koźmińskiego
Extensive internal training program

The Millenet internet banking system and the mobile application have been designed with users in mind and jointly with them in the spirit of Human-Centred Design



**SOCIAL
CAPITAL**

Quality of relations with the environment, Bank reputation, transaction safety, enhancing the society's financial awareness.

93% retail clients satisfied with the Bank's services

Financial education programs of the Bank Millennium Foundation and employee volunteerism

PLN 2.2 million provided by the Bank Millennium Group for donations and sponsorships in 2023

Digital security education activities for clients

... It supports business development within strategic pillars:

	Broad offering for individual clients		Innovative solutions with leading UX in electronic channels
	First choice bank for business clients		Sustainable organization
	Partner in the development of corporate clients		Friendly workplace

... and create value for stakeholders:

 CLIENTS	Inclusive banking (financial literacy) for all - no physical, infrastructural and digital obstacles	<ul style="list-style-type: none"> Permanent development of internet and mobile banking 70% of the branches are accessible to disabled persons 100% of the ATMs are accessible to disabled persons Facilities for Ukrainian-speaking clients on the Bank's website and in its banking app Golden CSR Leaf of the <i>Polityka</i> weekly - an award for companies with the highest corporate social responsibility standards
	Non-banking digital functionalities, e.g. e-administration	<ul style="list-style-type: none"> Over 1.4 million clients with access to e-administration - up over 24 % from 2022 Mobile application as a hub for managing daily affairs, not just finances
	High quality of service	<ul style="list-style-type: none"> 50 - NPS for retail clients Bank Millennium was the winner of this year's edition of the "Newsweek's Friendly Bank" ranking, winning in both ranking categories - "Bank for Kowalski" and "Remote Banking"

 EMPLOYEES	Employee turnover ratio	<ul style="list-style-type: none"> 3% - employee turnover ratio
	Education and development	<ul style="list-style-type: none"> Millennium Campus - a program to develop knowledge and skills with the objective of supporting the growth of innovation across the organization. The offer to participate in this program is addressed to all of the Bank's employees
	Work satisfaction	<ul style="list-style-type: none"> In 2023, Bank Millennium conducted an employee satisfaction survey. The participation rate was 51%. Among the respondents, 69% were satisfied with their work. This is more than the Polish benchmark (39%) and banking benchmark (62%)
	Respect for diversity	<ul style="list-style-type: none"> The Bank was awarded the title of "European Diversity Leader 2023" in a ranking compiled by the Financial Times and Statista
 INVESTORS	Excellent transparency	<ul style="list-style-type: none"> High standards of communication and access to information
	Business value	<ul style="list-style-type: none"> 77% y/y Bank Millennium's share price increase
	Return for stakeholders	<ul style="list-style-type: none"> Positive net result and solid credit risk management. Reported return on equity (ROE) of 9.1%
	Capital and MREL	<ul style="list-style-type: none"> Significantly improved CET and TCR to 14.7% and 18.1% respectively and met final MREL requirements
 SUPPLIERS	Ethical cooperation	<ul style="list-style-type: none"> 76% of all invoices paid within a range up to 30 days
	Responsibility in the supply chain	<ul style="list-style-type: none"> 100% of newly-executed contracts have a clause obligating suppliers to apply the principles of the Bank Millennium Group's Code of Ethics Implementation of Sustainability Guidelines for Suppliers



SOCIETY

Ecovolunteering

- In 2023, an employee eco-volunteer program called Our People'23: Save the Planet was implemented, focused primarily on protecting our planet, addressed to all employees of the bank and the Group - a total of 125 employees took part in the program

Financial education

- Since 2016, the Bank Millennium Foundation has been running its own financial education program for kindergarten children, called the "Financial ABCs." In 2023, as part of the tenth and eleventh editions, the Foundation carried out over 400 workshops in 119 kindergartens throughout Poland and reached nearly 10,000 preschoolers.
- This year's program was implemented under the honorary patronage of the Ministry of Finance

Promotion of culture

- Bank Millennium has been a patron of the Millennium Docs Against Gravity documentary film festival for 18 years.
- In May 2023, the 20th anniversary edition of the Millennium Docs Against Gravity festival took place, once again in a hybrid formula, with an audience of 144,000 people, for the third time in a hybrid formula
- In 2023, Bank Millennium became a partner of the Inside Seaside festival, a new event on the Polish music scene, with a good, varied music program and accompanying events, for music fans from all over Poland



ENVIRONMENT

Minimizing the environmental impact

- Bank Millennium is the only company from Poland recognized in the Europe's Climate Leaders 2023 list. It is a list of 500 companies from 33 European countries. It includes companies that in 2016-2021 achieved, among others: the greatest reduction in greenhouse gas emissions in relation to revenues and undertake activities in the field of transparency of reporting of activities related to emission reduction
- Bank Millennium Group consistently implements its greenhouse gas emission reduction goals
- Consistent reduction of resource consumption and emission intensity of occupied buildings. In September 2023, a modernized building in Gdańsk at Al. Grunwaldzka 19/23 received the LEED GOLD certificate

1.4. ESG IS AN INTEGRAL PART OF THE STRATEGY FOR 2022-2024

[GRI 3-3 ,OWN DISCLOSURE 10] ESG (Environmental, Social, Governance) issues have for years been an integral part of the Bank Millennium Group’s business strategy.

The ESG area is included in the Group’s Strategy for 2022-2024. Of crucial significance for Bank Millennium is not only to attain the goals set in the strategy, but also to take the proper path towards them, based on our commitment to society and the natural environment, in line with stringent standards of quality and ethics in the sales process and the services offered. The new strategy entitled “Inspired by People” highlights the importance attached to the inspirations provided by employees, clients and the community in which the Bank functions.

In 2022, the Bank adopted and announced the “ESG Strategy of the Bank Millennium Group for 2022-2024”, which builds on and specifies in greater details the environmental, social and governance goals presented in the Strategy for 2022-2024 “Millennium 2024: Inspired by People”.

Our sustainability activities have been planned in three areas, which are the pillars of our ESG Strategy:

- Environmental Protection
- Corporate Social Responsibility
- Corporate Governance

In the “Environmental Protection” pillar, we have set strategic goals in the following areas:

- Striving for climate neutrality
- Reduction of resource consumption
- Product offering supporting sustainability
- Responsible lending policy
- Partnership with organizations
- Educational activities

In the Strategy “Inspired by people” (and also in the ESG Strategy), the Bank for the first time defined its climate goals, including a reduction of its own greenhouse gas emissions by 50% in 2022 compared to 2020, achievement of climate neutrality in terms of its own emissions (by 2027) and full climate neutrality (by 2050). Its strategic objectives also include active support for decarbonization efforts of the Bank’s clients and granting PLN 2 billion of financing for sustainable and transformational projects for the clients of the Bank and the Bank’s Group over the years 2022-2024. For years the Bank has been involved in environmental activities, also to finance energy savings investments. These topics are discussed in detail in the “Environment” section of this report.

In the “Corporate Social Responsibility” pillar, we have set strategic goals in the following areas:

- Employees development and support
- Promotion of equality and diversity
- Supporting clients in growing their business and finance
- Banking without barriers
- Education and safety
- Charitable activity and support for culture

As an institution inspired by people and their needs, the Bank adopted the goal and aims to be an employer of first choice, ensure that services are available to all its clients and listen to and support the local community. As a responsible member of society the Bank continues to offer the Bank

Millennium Foundation’s financial education program targeting children and their parents, cultivating its more than thirty-year-old tradition of being a patron of culture and supporting the social initiatives pursued by the Bank Millennium Group’s employees to benefit their local environment. The implementation of tasks in this area is described in the “Society” section of this report.

In the “Corporate Governance” pillar, we have set strategic goals in the following areas:

- Sustainable organization
- Corporate governance and compliance policy
- Reporting and disclosures
- Climate risk management
- Sustainable supply chain policies
- Transparent communication

In management processes the Bank incessantly cares about observing high ethical standards as well as safety and transparency of relations with its clients. The Bank constantly develops its risk management processes while giving consideration to the rapidly evolving challenges regarding climate risks. These issues are discussed in more detail in the part "Governance" and in chapter "1.6. Disclosures regarding climate risks and opportunities according to TCFD guidelines" of this report

The “Inspired by People” Strategy for 2022-24 is available at the following address: <https://www.bankmillennium.pl/en/about-the-bank/investor-relations>

The ESG Strategy for 2022-2024 is available at the Bank’s website: https://www.bankmillennium.pl/documents/10184/84831/ESG_Strategy_2022-2024.pdf

The progress of the ESG strategic initiatives is monitored regularly by the Sustainability Committee. This process is described in Section 4.3 “Management Approach to Sustainable Development”.

1.5. APPROACH TO SUSTAINABLE DEVELOPMENT IN THE BANK MILLENNIUM GROUP

[GRI 2-12] The Bank’s Management Board is responsible for effective management of the sustainable development area in the Bank in respect to environmental, social and corporate governance issues, which includes the responsibility for the development, approval and updating of the organization’s goals, values, mission, strategies, policies and tasks related to sustainable development.

Bearing in mind the growing significance of sustainable development for the Bank Millennium Group’s business, in 2021 the Bank established within its structures the Sustainability Committee and the Sustainability Office, which was then, in accordance with the resolution of the Management Board adopted in December 2023, transformed into the Sustainability Department.

Detailed information on the organization of the ESG management process is provided in Section 4.3. “Management Approach to Sustainable Development”.

Sustainability principles

[GRI 2-23] Bank Millennium has defined the basic principles related to sustainable development at the level of the entire Bank Millennium Group. These principles were defined in the “Bank Millennium S.A. Sustainability Policy” (approved by the Bank’s Management Board) with the following documents published on the Bank’s website (<https://www.bankmillennium.pl/en/about-the-bank/esg#zasady-esg>) constituting its integral part:

- Sustainable Development Principles
- Anti-Corruption Principles
- Principles of Social Impact
- Human Rights Principles
- Diversity Principles
- Corporate Volunteerism Principles
- Responsible Financing Principles

Besides the following document were published on the Bank’s website (<https://www.bankmillennium.pl/en/about-the-bank/esg#zasady-esg>):

- Suppliers Sustainability Guidelines (approved at the level of the Bank’s Management Board member)
- Climate Policy (approved by the Bank’s Management Board)

Sustainability principles adopted by the Bank Millennium Group, which integrate the environmental, social and governance dimensions, include:

- adapting the decision-making process, in all areas of the Bank Millennium Group, to the implementation of the United Nations Sustainable Development Goals (“UN Sustainable Development Goals”), as well as generally applicable laws and national and international standards in the field of sustainable development;
- taking into account the UN Sustainable Development Goals in the development and offering of financial products;
- transparency of disclosed information regarding the implementation of activities in the area of sustainable development by the Bank Millennium Group;
- building awareness of Employees, Clients and other stakeholders of the Group in the field of sustainable development;
- adhering to the highest standards in the conducted business, including the Principles of Corporate Governance for Supervised Institutions and Best Practices for WSE Listed Companies, as well as striving to constantly ensure full compliance with generally applicable laws and business standards;
- building partnership relations and constant involvement in cooperation with communities - both external and internal - in the search for opportunities to create social value, by supporting initiatives related to culture, education and financial knowledge, as well as activities within the framework of employee volunteering.

Based on the UN Sustainable Development Goals, as well as on the obligations arising from the Diversity Charter signed by the Bank, as well as internal rules and good practices, we have made the following commitments:

- Integrating environmental and social risks into the customer risk assessment process and taking into account ESG risk factors in sectoral policies with respect to the corporate Clients;

- Defining the list of sectors and activities not financed by the Bank Millennium Group - the Group identifies sectors of economic activity or projects whose financing is inconsistent with the Group's commitment to protect the environment, promote sustainable development, combat climate change and preserve biodiversity. For this reason, the Group has identified business sectors excluded from financing or conditional financing sectors (financing of activities or projects in these sectors is possible under additional conditions);
- Financing of environmentally friendly and energy-efficient projects, including projects related to the replacement of coal-fired energy with low-carbon energy sources;
- Carrying out activities aimed at reducing the carbon footprint;
- Respect for human rights - Bank Millennium Group takes into account and promotes the principles of human rights through the application of ethical business practices to various stakeholders, in particular employees, clients, shareholders, suppliers, local communities. Such practices are clearly defined in the relevant internal regulations of the Group;
- Sustainable development competency generation: we offer training and initiatives for employees to develop their sustainability competencies;
- Promoting a culture of responsible consumption: The Bank Millennium Group has adopted, as part of the Sustainability Guidelines for Suppliers, a set of requirements for suppliers covering sustainability issues;
- Influencing society: promoting a culture of social responsibility, developing activities for and with different stakeholder groups that support, directly or indirectly, social development.

The above commitments in the field of sustainability policy apply to all activities and business relations of Bank Millennium.

We attach special importance to human rights issues, since the observance of human rights is incorporated into the main goals and commitments of the Bank Millennium Group. As the Bank Millennium Group, we are committed to respecting human rights, ensuring compliance with the provisions of Polish and international law (including the United Nations Universal Declaration of Human Rights) and defining internal practices and procedures in this area.

We have adopted the following principles related to respecting and promoting human rights:

- Prohibition of forced labour, child labour and human trafficking - we reject all forms of forced labour related to human trafficking and child labour, while complying with the provisions of Polish and international law.
- Prohibition of discrimination and violation of workers' rights - we promote a culture of tolerance and reject all forms of discrimination based on origin, gender, sexual orientation, family situation, nationality, ethnicity, religion, membership of social groups and political beliefs or any kind of individual physical characteristics, health conditions or disability. We provide a healthy and safe working environment, free from discrimination, mobbing and harassment and all forms of violence.
- Freedom of association - we respect the freedom of association and observe the principles enabling the association of employees, as well as create conditions for action for organisations associating employees, in accordance with applicable law.
- Remuneration - we promote fair and equitable remuneration of our employees, based on their qualifications, experience, scope of duties and functions. We comply with the provisions of national and international law, in particular the Labour Code, as well as internal regulations in this respect.
- Relations with employees and shareholders - we promote human rights in relations with employees and shareholders, through the implementation and application of adequate

internal regulations, including The Code of Ethics of the Bank Millennium Group, which define the principles shaping healthy, transparent relations with these stakeholder groups.

- Client relations - we promote sustainable financing as part of the corporate culture of the Bank Millennium Group. In this regard, we take human rights into account in our relations with our clients by providing financial products and services aimed at promoting social inclusion (preventing exclusion) and non-discrimination and tailored to the individual needs of our clients. In this context, we adopt policies and procedures that ensure an adequate approach to our clients, respecting their right to privacy and ensuring the confidentiality and security of their data.
- We treat our clients with respect, not allowing any discrimination based on origin, gender, sexual orientation, family situation, nationality, ethnicity, religion, social status and political beliefs or any individual physical characteristics, health conditions or disability.
- Relations with suppliers and partners - we promote respect for human rights in our suppliers and partners. We have developed "Sustainability Guidelines for Bank Millennium Group Suppliers", in which we indicate how we understand compliance with human rights within the supply chain. We expect all Bank Millennium Group suppliers and partners to respect human rights, rejecting forced labour and child labour, ensuring fair and equitable remuneration and offering equal opportunities and a working environment free from discrimination and all forms of violence.
- Social relations - we support the promotion of human rights in the communities around us, ensuring that our activities have a positive impact on the environment.

The Bank Millennium Group promotes the principle of social responsibility providing for the groups that are in need or those at risk of exclusion. The Bank Millennium Group acts with respect for human dignity and respects the right to equal treatment, regardless of age, gender, ethnic and national origin, religion, family status, sexual orientation, health status, financial situation, religious and ideological beliefs, membership in trade unions or other reasons that may expose to discriminatory behaviour.

In particular, Bank Millennium Group's policies point to the need to protect and support: individuals at risk of exclusion, people with disabilities, employees who are parents, people in difficult life circumstances; Bank Millennium Group entities offer social support to such individuals and the eligibility criterion is the financial and personal situation, including the state of health.

Information about the documents describing the principles of sustainable development adopted in the Bank Millennium Group was provided to the employees of the Group in January 2023 in a form of an article published on the corporate intranet "Świat Millennium". In December 2023, the Bank published communication aimed at reminding about the ESG Principles at the Bank and encouraging people to become familiar with them. The employees of franchise partners were also informed in the same way. In the case of other business partners, the Bank did not prepare a separate communication, but the documents described above were made available to them in the ESG site on the Bank's website. We assume that this way, in the future, the Bank's business partners will also be able to become acquainted with the applicable policies in the area of sustainable development and/or their changes.

Partnership with United Nations Global Compact

[GRI 2-28] In July 2023 Bank Millennium has joined the United Nations Global Compact ("UNGC") as a direct participant. Joining the UNGC means a commitment to adhere to and implement the Ten Principles of the UN Global Compact covering four key areas: human rights, labour standards, environment protection and anti-corruption. The Bank's accession to the UNGC is another major step towards the full implementation of the UN Sustainable Development Goals by the Bank.

In September 2023, the President of the Management Board of Bank Millennium Joao Bras Jorge joined the Program Council of the UN Global Compact Network Poland ("UN GCNP"). The Council develops key directions for the UN GCNP with the goal of providing effective support for businesses to achieving the UN Sustainable Development Goals. The UN GCNP Program Council includes high-level professionals and managers representing UN Global Compact member companies active in a minimum one program in the following areas: human rights, environmental protection and anti-corruption.

Implementation of obligations set forth in policies

[GRI 2-24] Responsibility for the implementation of sustainability policy commitments is allocated in accordance with the allocation of powers within the Bank's Management Board and the responsibilities of individual organizational units and their managers (described in the Bank's Organizational Bylaws and the organizational bylaws of individual units).

The Bank is of the opinion that environmental, social and governance issues concern many areas of the Bank's operations and are an integral part of its business. Because of the importance of these matters, the Sustainable Development Department, which is responsible for supervising and coordinating the implementation of sustainable development principles in the Bank and the Bank's Group, reports directly to the Bank's Management Board Chairman, while the Sustainability Committee is comprised of all members of the Bank's Management Board.

The commitments arising out of the sustainable development policies are integrated with strategic goals and then the goals themselves are implemented operationally through:

- adoption of sustainable development goals both in the Group's Strategy for 2022-2024 as well as in the more detailed ESG strategy for 2022-2024,
- incorporation of environmental, social and governance issues into operational processes and procedures,
- implementation of a process for monitoring the implementation of strategic initiatives in the ESG area through the work of the Sustainability Committee.

Sustainability commitments have a significant impact on the development of the Group's business relationships.

The Group operates in accordance with the adopted Environmental Policy, observing the exemptions in the financing of certain activities described in that document and adhering to its commitment to support the financing of environmental and energy efficient projects. Details of this policy are provided in chapter 2.1.2. "Environmental Policy of the Bank Millennium Group".

Offering sustainable financial products and a responsible lending policy are important aspects of the Bank Millennium Group's sustainability efforts.

The Bank Millennium Group has incorporated environmental and social risks in the client assessment, lending and project financing processes, taking into account not only the risks related to the business sectors in which the clients operate, but also their approach to environmental, social and corporate governance issues.

In this context, the Bank Millennium Group recognizes that there are certain sectors of activity or projects, which do not correspond to the Group's commitment to protect the environment, promote sustainable development, combat climate change, preserve biodiversity and minimize social risks and accordingly sets both exemptions and restrictions, which should be considered when making decisions to provide financing.

We also see our great responsibility to offer products and services that prevent financial exclusion and take social principles into account. The Bank Millennium Group provides products and services

that promote prevention of social exclusion, which includes supporting those parts of the society that have fewer opportunities to use digital banking solutions, making access to financial products more widespread and supporting entrepreneurship.

Relations with the Bank Millennium Group's suppliers are governed by the Sustainability Guidelines for Suppliers. Additionally, in its supplier selection process the Group uses the Sustainability Supplier Questionnaire.

[GRI 2-23]The implementation of the commitments made in the Bank Millennium S.A. Sustainability Policy is verified in many different ways: by the Bank's internal control system, the system of reporting to the Management Board and to the committees operating in the Bank, including the Sustainability Committee, whose role is to make key decisions on sustainability in the Bank Millennium Group with regard to environmental, social and governance factors.

1.6. DISCLOSURES OF CLIMATE-RELATED RISKS AND OPPORTUNITIES ACCORDING TO TCFD GUIDELINES

Introduction

The Task Force on Climate-related Financial Disclosures (TCFD) is an initiative created by the Financial Stability Board (FSB) to develop consistent and transparent recommendations for reporting financial information related to climate change. TCFD's goal is to give stakeholders access to information that will allow them to make more informed decisions that take into account climate risk and its impact on financial stability.

TCFD's disclosures consist of four pillars: Governance, Strategy, Risk Management, and Metrics & Targets.

The Bank presents below its disclosures on climate risks and opportunities prepared in accordance with TCFD guidelines.

Pillar I of the TCFD - Governance

[1.a. Describe the board's oversight of climate-related risks and opportunities]

The Bank's Management Board adopted the document "ESG - governance and control arrangements", which sets out the basic principles related to the management and control of the ESG area (including the management and control of ESG risks) at the level of the entire Bank Millennium Group. The main objective of these principles is to provide the Bank Millennium Group with a robust framework for the management and control of the ESG area (including the management and control of ESG risks) in full compliance with legal and regulatory requirements, applicable internal regulations and best market practices. By taking an integrated view of managing the impact of ESG factors on financial risks, the ESG risk management and control framework adopted contributes to supporting the Bank's sustainable growth and value creation over the long term.

The Bank's Management Board is responsible for setting, approving and overseeing the effective implementation of the Bank Millennium Group ESG Strategy, as well as the Risk Strategy, which includes ESG risk as a component of other risks specific to the Bank's operations. The Bank's Management Board also approves the Bank's sustainability and other ESG-related corporate policies and principles, the indicators and quantitative limits within the risk appetite statement, and ESG reporting, including the Bank's Group's annual ESG report.

The Bank's Management Board is also responsible for ensuring the required organizational structure and resources for managing the ESG area (including ESG risk management).

The Supervisory Board oversees the Bank's Management Board's execution of strategic ESG activities, as well as the implementation of the Risk Strategy, which includes ESG risk as a component of other risks specific to the Bank's operations.

Within the Management Board, the sustainability area is supervised by the President of the Management Board, while ESG risk management is supervised by the Bank's Management Board Member responsible for Risk.

[1.b Describe management's role in assessing and managing climate-related risks and opportunities]

The **Sustainability Committee** plays an important role in the management and control of the ESG area, while the Risk Committee plays an important role in the ESG risk management process. Both committees include all members of the Bank's Management Board as well as key managers of the Bank.

The **Sustainability Committee** makes key decisions on the implementation of business activities that affect Bank Millennium's climate risk and opportunity profile. In particular, the Committee adopts operational plans related to the implementation of the ESG Strategy, as well as monitors and evaluates the implementation of planned activities in terms of their completeness, quality, meeting the required deadlines and the planned budget.

The **Risk Committee** is responsible for risk control at Bank Millennium, including reviewing principles, policies, rules and practices relating to managing risks - including ESG risk (including climate risk), making decisions on key elements of credit policy - including those pertaining to ESG risk. The Risk Committee periodically reports to the Bank's Management Board on key issues related to the impact of risk - including ESG risk - on the Bank's overall risk profile.

The Bank has established a **Sustainability Department**, which is responsible for overseeing and coordinating the implementation of sustainable development principles at Bank Millennium. The Department also supports the Sustainability Committee in carrying out its tasks, develops operational plans for implementing the Sustainable Development Strategy in consultation with other Bank units, and reports internally and externally on sustainability issues. The Sustainable Development Department is supervised directly by the President of the Bank's Management Board.

The **Risk Department (DMR)** is responsible for integrating ESG risks (including climate risk) into the Bank's risk management system. Key tasks of the DMR include consideration of ESG risk within the risk appetite, analysis of the materiality of the impact of ESG risk on the Bank's risk profile, development of ESG risk assessment methodologies within the framework of existing risk assessment methodologies and processes, and monitoring of the impact of ESG risk on the area of capital adequacy.

In addition, sustainability activities in specific areas of authority are the responsibility of other units of the Bank and the Bank's Group in accordance with their areas of responsibility, forming an integral part of the business, with distinct areas of activity assigned to employees holding senior management positions (those reporting directly to the President of the Management Board or members of the Management Board of either the Bank or the pertinent Group companies).

Pillar II of TCFD - Strategy

[2.a. Describe the climate-related risks and opportunities the organization has identified over the short, medium, and long term]

Types of climate risk identified by Bank Millennium

According to the classification recommended by the TCFD, among others, **the Bank divides climate risk into physical risk and transition risk.**

Physical risk refers to the financial impact of a changing climate, including more frequent extreme weather events and gradual climate change, as well as environmental degradation such as air, water and soil pollution, water scarcity, biodiversity loss and deforestation. Physical risks are therefore classified as "acute" when they result from extreme events such as droughts, floods and storms, and "chronic" when they result from progressive changes such as rising temperatures, rising sea levels, water scarcity, biodiversity loss and resource scarcity. This can directly result in, for example, damage to property or reduced productivity, or indirectly lead to subsequent events such as disruption of supply chains.

The range of physical risk factors recognized and analyzed by the Bank is consistent with the range of factors defined by the EU Taxonomy (via Annex A of the Delegated Regulations defining the technical criteria for recognizing activities as environmentally sustainable) and includes:

Acute physical risk factors	Chronic physical risk factors
<ul style="list-style-type: none"> — Heat waves/extreme cold weather — Droughts — Floods / waterlogging — Heavy precipitation (rain / hail / snow) or thunderstorms — Cyclones / hurricanes / tornadoes — Landslides — Spontaneous fires 	<ul style="list-style-type: none"> — Changes in average temperatures (air / water) — Variability of temperature amplitudes — Melting permafrost — Changes in wind circulation patterns — Changes in rainfall patterns and types — Water acidification — Rising ocean / sea levels — Soil erosion / degradation

The Bank's financial activities are conducted predominantly in Poland. Consequently, the Bank, from the broad catalog of physical risk factors set forth in the table above, has selected physical risk factors relevant to the geographic scope of its financial activities based on publications of the Intergovernmental Panel on Climate Change (IPCC). Factors relevant to the region in which the Bank conducts its financial activities include:

- floods / waterlogging,
- droughts / water shortages,
- heat waves.

Transition risk refers to the financial loss that may result, directly or indirectly, from the process of adapting to a low-carbon and more environmentally sustainable economy. This can be caused, for example, by the relatively sudden adoption of climate and environmental policies, technological advances or changes in market sentiment and preferences.

The range of transition risk factors recognized and analyzed by the Bank is consistent with the range of factors defined by the TCFD and includes:

Transition risk

Political factors of transition risk:

Introducing regulations on:

- reducing greenhouse gas emissions, mandatory purchase of greenhouse gas emission allowances,
- carbon footprint tax mechanisms, banning the production of certain goods (e.g., combustion cars).

Technological factors of transition risk:

- Technological changes related to energy efficiency, low-carbon transportation and increasing use of non-fossil fuels or other technologies,
- Existing business models of companies may rely on technologies that may be replaced or on the use of energy sources that may become more expensive as a result of policy actions (whether through higher efficiency standards or the introduction of carbon taxes).

Behavioral factors of transition risk:

- Investor preferences and changing expectations with regard to climate change, which require climate risk issues to be taken into account,
 - Consumer preferences are shifting toward more climate-friendly consumption. For this reason, retail clients may expect their savings or investments to go toward climate-friendly causes. Increased awareness and clear demand for climate-friendly financial products and investments provide a potential incentive for companies and banks to adjust their business strategies, regardless of potential regulatory or supervisory approaches.
-

Types of climate-related opportunities identified by Bank Millennium

Climate-related changes bring business opportunities, especially in the context of developing a portfolio of financial assets supporting economy green transformation and sustainable development.

In its strategy, the Bank's Group aims to increase the share of financing for industries and projects that support the transition to a low-carbon economy.

The Bank's Group sees key climate-related business opportunities in the development of financing of:

- renewable energy sources (RES),
- energy-efficient real estate and projects that increase energy efficiency in construction,
- new resource-efficient industrial machinery,
- solutions that support a circular economy (CE), and
- low-emission transport.

[2.b. Describe the impact of climate-related risks and opportunities on the organization's businesses, strategy, and financial planning]

The Bank identifies, assesses, controls and reports on climate risks and opportunities through the prism of the impact of climate risks and opportunities on the Bank's risk profile expressed in terms of so-called traditional banking risks (i.e., in particular, credit, operational, reputational, liquidity, market, strategic and economic risks).

The most significant risk in the Bank's operations is credit risk. Actions on the Bank's credit portfolio are therefore key to achieving the Bank's strategic goals of financing the transition to a low-carbon and climate-resilient economy, and thus, the credit portfolio is important to the Bank's identification of climate-related opportunities.

The Bank also identifies and evaluates the impact of climate risks and opportunities on its other banking risks, but in this area the Bank does not identify specific business opportunities for itself at

this time (with the exception of reputational and strategic risks), but rather focuses on appropriately determining the materiality of climate risks over different time horizons.

In the area of reputational and strategic risk, the Bank identifies the following key climate-related opportunities:

- proper management of the business opportunity associated with the expected increased demand for green project financing,
- environmentally responsible management of a portfolio of financial assets, striving to increase the share of environmentally sustainable assets,
- responsibly management of the environmental impact of its own operations, including through measures to reduce its own greenhouse gas emissions or by implementing solutions that support circular economy.

Impact of climate-related risk factors and opportunities on credit risk

Portfolio of financing provided to corporate customers

Climate risk	Channels of transmission to the Bank's risk profile	Bank's approach to risk management	Key climate-related opportunities
Physical risk	Potential impact of future increases in the risk of floods, heat waves, droughts on the company's income statement or on the value of real estate collateral	The Bank takes this risk into account by incorporating a industry policy in its credit decisions that takes into account transition risk, physical risk and social risk. Physical risk was also included in the conducted analysis of the materiality of ESG risks. The portfolio is geographically diversified across Poland, with no concentration in regions with higher physical risk. The Bank is taking further steps to expand the data collected for physical risk assessment.	Financing solutions that support the securing of borrowers' operations against the negative effects of physical risk.
Transition risk	Decrease in revenue / increase in costs due to the need to comply with climate policy Decrease in revenue / increase in costs due to the need to adapt to technological changes supporting green transition or due to behavioral changes in the market	The Bank takes this risk into account by incorporating a industry policy in its credit decisions that takes into account transition risk, physical risk and social risk. In addition, the Bank has a industry exclusion policy for industries deemed particularly harmful to the environment or society. Transition risk was also included in the conducted analysis of the materiality of ESG risks. The Bank is taking further steps to expand the data collected for transition risk assessment.	Financing of "green" projects / facilities, supporting the transition to low-carbon activities (RES, energy-efficient construction, low-carbon transportation, resource-efficient machinery, CE projects).

Portfolio of financing provided to small business segment customers

Climate risk	Channels of transmission to the Bank's risk profile	Bank's approach to risk management	Key climate-related opportunities
Physical risk	Potential impact of future increases in the risk of floods, heat waves, droughts on the businesses' income statement or on the value of real estate collateral	The portfolio is geographically diversified across Poland, with no concentration in regions with higher physical risk.	-
Transition risk	Risk factors include technological, legal and political changes relating in particular to electricity production and supply	The Bank has implemented a industry exclusion policy for industries deemed particularly harmful to the environment or society.	Financing of "green" projects / facilities, supporting the transition to low-carbon activities (RES, energy-efficient construction, low-carbon transportation, resource-efficient machinery, CE projects).

Portfolio of mortgage loans granted to consumers

Climate risk	Channels of transmission to the Bank's risk profile	Bank's approach to risk management	Key climate-related opportunities
Physical risk	The possible impact of a future increase in flood risk on collateral values and thus on credit losses.	The Bank incorporates a due diligence analysis for areas at risk of flooding (ongoing analysis) into its ongoing lending processes.	-
Transition risk	Potential impact of building energy inefficiency on property prices and rental/sales opportunities	The Bank monitors regulatory risks associated with energy inefficient properties on an ongoing basis.	Financing energy-efficient real estate.

Portfolio of consumer loans (unsecured) to consumers

Climate risk	Channels of transmission to the Bank's risk profile	Bank's approach to risk management	Key climate-related opportunities
Physical risk	The potential impact of a future increase in the risk of floods or heat waves on consumers' ability to repay unsecured loans.	The portfolio is diversified across multiple locations throughout Poland.	-
Transition risk	Potential impact of political or technological changes on consumers' ability to repay unsecured loans	The Bank does not identify the need to implement specific mitigation mechanisms at this time.	Development of product offerings designed to finance consumer RES, low-carbon transportation, or energy efficiency improvements to real estate.

Impact of climate risk factors on other banking risks

Type of banking risk	Channels of transmission of climate risk to the bank's risk profile	Risk management approach
Operational risk	<p>Potential damage to the Bank's own infrastructure due to floods and waterlogging - in long-term scenarios</p> <p>Potential disruption of business continuity due to impact of heat risk on critical IT infrastructure</p>	<p>The Bank insures against physical damage to infrastructure. The Bank has implemented and applies business continuity management policies and processes and contingency plans to ensure stability and resilience to operational incidents.</p> <p>Outsourcing in the banking sector is strictly regulated by the Banking Law, EBA Guidelines and supervisory expectations of the PFSA, among others. The Bank has detailed internal instructions on the process of selecting and approving external entities. Risk analysis, in particular with regard to the stability and business continuity of external entities, is the basis and top priority of the process of selecting these entities, aimed at mitigating any material risks that could disrupt the Bank's daily operations.</p>
Reputational risk	<p>Controversy over the financing of industries that are perceived in the market as harmful to the environment.</p> <p>Errors or intentional deception in the Bank's conduct, in particular with regard to customer relations</p>	<p>The Bank has implemented the "Responsible Financing Principles" which means excluding or limiting financing for industries, activities and projects that do not meet the Bank's commitments to protect the environment, promote sustainable development and minimize social risks. It also adheres to the current "Environmental Policy."</p> <p>The Bank takes into account the legal aspects of the agreements it signs, the risk of incorrect design of products and services and the risk of optimum selection of products to suit clients' needs and abilities.</p> <p>Reputational risk factors are also included in the Bank's operational risk taxonomy and are managed accordingly in accordance with overall escalation processes and triggers.</p>
Market risk (in the trading book)	<p>The potential impact of transition and physical risk on the country risk of the issuing country (the Bank has commercial exposure mainly to Polish bonds) and thus on bond pricing (due to the impact on the country's debt and market perception).</p>	<p>The Bank's trading book consists mainly of government bonds - primarily Polish.</p> <p>The Bank may diversify its treasury bond portfolio with issues from EU countries less exposed to transition risk than Poland, provided it makes economic sense for the Bank to do so at the time.</p> <p>The Bank regularly conducts internal stress tests for market risk. Based on the current state of the market, the scenarios include extreme shocks, no less than potential climate shocks. The Bank is closely monitoring market and supervisory developments in this area.</p> <p>Poland is actively participating in the EU's climate transition policy, with strategic work on decarbonizing Poland's energy mix underway, and Poland and Polish cities have developed and implemented climate change adaptation strategies and plans to make the economy more resilient to climate change and potential physical hazards.</p>
Liquidity risk	<p>Climate factors can affect the value of financial assets, which in turn can affect the liquidity of those assets. Climate factors can also affect the availability or stability of financing.</p>	<p>The Bank regularly conducts its own internal liquidity stress tests, covering several stress test scenarios.</p> <p>The Bank does not plan to concentrate its deposit base in high-carbon industries or in countries with higher social/management risks.</p>
Strategic risk	<p>Current or future risks to earnings, capital and liquidity resulting from changes in strategy and adverse business decisions, including strategic decisions that must be made to comply with regulatory standards, namely capital, liquidity or leverage ratios. This includes climate-related risks, such as transition risk and physical risk.</p>	<p>Carrying out projects supporting the Bank's strategic ESG goals and concerning: the implementation of a process for identifying sustainable assets and managing ESG risks.</p> <p>Participation of the management boards of all Bank Millennium Group companies and key managers in a training program on green financing and ESG risks.</p> <p>Ongoing monitoring of market and regulatory developments.</p>

Type of banking risk	Channels of transmission of climate risk to the bank's risk profile	Risk management approach
Economic risk	Potential impact of new climate policies and associated legal and physical risks, such as floods or droughts.	<p>Carrying out projects supporting the Bank's strategic ESG goals and concerning: the implementation of a process for identifying sustainable assets and managing ESG risks.</p> <p>Participation of the management boards of all Bank Millennium Group companies and key managers in a training program on green financing and ESG risks.</p> <p>Ongoing monitoring of market and regulatory developments.</p>

[2.c. Describe the resilience of the organisation's strategy, taking into consideration different climate-related scenarios, including a 2 °C or lower scenario]

Bank Millennium attaches great importance to managing climate risks and opportunities, taking into account the short-term, medium-term and long-term time horizons.

The Bank is taking a perspective of up to one year as a short-term period. During this period, the Bank focuses on the sudden effects of physical risk by avoiding potential exposures (direct or indirect) exposed to this type of risk. The Bank defines the medium-term perspective as a period of 2 to 5 years. The main risks identified by the Bank during this period are transition risks, generally related to the indirect effects of the transition to a low-carbon economy (e.g., carbon taxation, energy costs, technological changes, changes in commodity prices). A time horizon of more than 5 years is identified as long-term. The main identified risk in this perspective is the alignment of the portfolio with the transition targets (limiting global warming to 1.5°C), entailing the need for appropriate Bank actions to support portfolio transition.

In 2023, the Bank conducted a comprehensive analysis of the materiality of the impact of climate risk on traditional banking risks, i.e. credit, operational, market, liquidity, strategic, reputational and economic risks.

The conclusions of this analysis allow us to estimate the resilience of the Bank's business model to climate change. In addition, the Bank plans to implement a methodology and process for conducting climate stress tests, which will provide a complementary and more sophisticated quantitative approach to assessing the resilience of the Bank's business model to climate change under preset climate change scenarios and time horizons.

Providing financing to businesses and consumers in the form of credit, loans or leases is the cornerstone of the Bank's business model. These activities are primarily financed through deposits accepted by the Bank from its customers. Accordingly, the Bank recognizes that it is critical to understanding the resilience of the Bank's business model to climate risk to determine the materiality of the impact of climate risk on the Bank's credit and liquidity risk profile.

The resilience of the Bank's business model through the prism of analysis of the materiality of the impact of climate risk on credit risk:

Portfolio of financing provided to companies (corporations and small business):

Analysis of resilience to transition risk:

As part of the materiality analysis, the Bank conducted a review of industries from the perspective of emissions. This analysis showed that the Bank has low exposure to industries with medium-high exposure to transition risk (approx. 5% of the Bank's total credit portfolio).

Bank Millennium Group does not finance new coal mines and coal-fired power generation projects, except for new projects related to reduction of pollution. New financing in the energy sector is only possible if it serves the commitment to carbon-free energy sources and the energy transition to carbon-free energy sources. The Bank's activities in this area reflect the designated strategy to

integrate climate risk into the Bank's risk management policies, as well as to promote innovation and the transition to a low-carbon economy.

Analysis of resilience to physical risk:

The Bank does not have a concentration of exposures in industries typically characterized by higher exposure to physical risks associated with climate change (such as agriculture).

In addition, based on its analysis of climate risk maps for Poland and materiality analysis, the Bank concludes that it has a negligible volume of exposures in regions with elevated physical risk (about 1% of the Bank's total credit portfolio).

Portfolio of mortgage loans granted to consumers:

Analysis of resilience to transition risk:

Based on its estimates, the Bank currently does not identify any properties in its financing portfolio that fall into the two lowest / worst energy efficiency classes.

The Bank monitors on an ongoing basis legislative changes regarding the introduction of criteria for specific classes of energy efficiency in Poland and the development of the regulatory environment in terms of possible restrictions on the possibility of selling/renting energy inefficient properties.

Analysis of resilience to physical risk:

The Bank's portfolio is dispersed and geographically diversified across Poland. The Bank has no financial concentrations of real estate in areas with elevated physical risk. Geographic diversity provides greater resilience to physical risks associated with climate change, such as flooding or waterlogging. The climate risk management regulations implemented by the Bank are designed to minimize the Bank's exposure to potential damage and loss, while enhancing operational and financial stability.

Portfolio of (unsecured) consumer loans extended to consumers:

Analysis of resilience to transition risk:

The Bank does not identify in its portfolio a concentration of financing for consumers employed in industries significantly exposed to transition risk.

Analysis of resilience to physical risk:

The Bank's portfolio is dispersed and geographically diversified across Poland, which translates into a lack of concentration of financing for consumers living in regions with elevated physical risk.

The resilience of the Bank's business model through the prism of analysis of the materiality of the impact of climate risk on liquidity risk:

Analysis of resilience to transition risk:

The Bank has implemented and applies limits on the concentration of deposits accepted from individual businesses as part of its risk management strategy, thereby minimizing the potential risk of over-reliance on funding from single, large depositors, which enhances the Bank's financial stability.

As part of its analysis of the materiality of transition risk in liquidity risk, the Bank reviewed the twenty largest corporate depositors - none of the companies are among the industries with high emissions and thus greater exposure to transition risk.

Analysis of resilience to physical risk:

The dispersed geographic distribution of depositors across Poland (both businesses and consumers, whose deposits make up the majority of the Bank's funding) avoids concentration in locations with

elevated physical risk. The Bank does not currently identify a material risk of deterioration in the Bank's liquidity due to physical risk.

Pillar III of TCFD - Risk Management

[3.a. Describe the organization's processes for identifying and assessing climate-related risks]

The Bank's approach to identifying climate risk factors and determining the channels of transmission of these risks to traditional banking risks is presented in Sections 2.a. and 2.b. of this disclosure note.

The key process of assessing the materiality of the impact of climate risk factors on the Bank's risk profile is the process of assessing the materiality of the impact of ESG risk factors (including climate risk factors) on traditional banking types. The Bank conducted such a materiality assessment in 2023 - the key conclusions of this analysis are presented in Sections 2.b. and 2.c. of this disclosure note. The Bank will conduct such materiality analysis periodically, at an annual frequency.

In addition, the Bank continuously monitors the regulatory and supervisory environment regarding ESG issues (including those related to climate-related risks and opportunities) and complies with relevant regulations as well as supervisory expectations in a timely and adequate manner.

[3.b. Describe the organization's processes for managing climate-related risks]

Based on the results of the materiality analysis of the impact of climate risk on the Bank's risk profile, taking into account expert judgment, the Bank determines the types of banking risks for which it is reasonable to develop detailed methodological solutions for the identification, measurement, control and reporting of climate risk.

Currently, the Bank considers the implementation of detailed solutions for the integration of ESG risks (including climate risk) to be justified for credit risk. The Bank is also considering including climate risk scenarios in its internal stress tests of market and liquidity risk.

The Bank's approach to managing climate risk within each of its significant banking risks is described in Section 2.b.

The following is a summary of the key climate risk management tools and processes within the credit risk framework, for which the Bank identifies a legitimate need to have detailed solutions to manage climate risk.

Climate risk assessment tool / process	Key assumptions of the climate risk management process
Financing provided to corporations	
Policy of industries excluded from financing	The policy is not to provide new financing to customers (commercial undertakings) in industries deemed environmentally or socially harmful, including industries that have a negative impact on achieving the goals of the transition to a low-carbon economy.
Credit risk assessment of industries by PKD classification	The Bank periodically assesses the credit risk of industries according to the PKD classification, this assessment takes into account transition risk, physical risk and social risk based on recognized external data sources. The Bank takes industry risk into account when making credit decisions.
Implementation of the "Principles for identifying and monitoring sustainable financing at Bank Millennium S.A."	According to the adopted regulation, the Bank will identify whether the financing granted is environmentally sustainable (both according to the Bank's internal definition and according to the EU Taxonomy). The Bank views environmentally sustainable financing as a climate-related opportunity and as a factor in mitigating climate risks identified by the Bank.
Mortgage financing provided to consumers	
Identification of environmentally sustainable real estate	The Bank has begun to obtain information on the energy performance of financed properties and is assessing whether the property's recorded level of primary energy demand meets the criteria for materiality in the environmental goal of "climate change mitigation" according to the EU Taxonomy. The Bank views financing energy-efficient properties as a climate-related opportunity and as a factor in mitigating climate risks identified by the Bank.
Identification of properties with elevated physical risk	The Bank includes information about the characteristics of the land on which the property is built in the expert appraisal reports and in the valuation of the collateral. In addition, the Bank - based on publicly available physical risk maps for Poland - identifies properties located in areas with an elevated risk of flooding or waterlogging over a time horizon aligned with the maturity of the loan, under the conservative RCP 8.5 scenario.

[3.c. Describe how processes for identifying, assessing, and managing climate-related risks are integrated into the organization's overall risk management]

The Bank's ESG risk management system (including climate risk) is an integral part of the overall risk management system and is implemented in accordance with applicable regulations, supervisory expectations, market standards and internal regulations.

The conclusions of the analysis of the materiality of the impact of climate risk on traditional banking risks are accepted by the Bank's Management Board and are an integral part of the Risk Strategy, approved by the Supervisory Board.

The Bank has implemented the ESG (including climate) risk management tools detailed above in Subsection 3.b.

Pillar IV of TCFD - Metrics and Targets

[4.a. Disclose the metrics used by the organization to assess climate-related risks and opportunities in line with its strategy and risk management process]

In the Risk Management Strategy for 2022-2024 approved by the Bank's Supervisory Board, the Risk Appetite framework was defined for selected ESG risk factors: level of own emissions, diversity and social initiatives, as well as the degree of implementation of the ESG Strategy.

In addition, information and metrics on the degree of implementation of strategic ESG initiatives are periodically reported to the Sustainable Development Committee.

The Bank will develop an approach to measuring and monitoring its own exposure to climate-related risks and opportunities.

Metrics used assess climate-related risks

In 2024, the Bank plans to implement measures of its financial asset portfolio's exposure to climate risk. The key measures planned for implementation will determine the shares of exposures exposed to physical risk and transition risk in the Bank's material portfolios.

Metrics used assess climate-related opportunities

In this ESG report, the Bank published the Green Asset Ratio (GAR) for 2023 for the first time, in accordance with the EU Taxonomy regulations. GAR is a measure of the share of environmentally sustainable assets according to the technical criteria of the EU Taxonomy in the Bank's Group's consolidated total assets eligible for inclusion in the GAR denominator. The Bank views the GAR as an indicator of the opportunities associated with financing exposures that make a significant contribution to the environmental goals identified in the EU Taxonomy.

Detailed disclosures on the EU Taxonomy are presented by the Bank in this Report in Section 2.3. "EU Taxonomy."

The Bank will develop metrics related to the monitoring of green financing volumes, on the basis of adopted internal criteria based on best market practices and the EU Taxonomy, as described in the Principles for Identifying and Monitoring Sustainable Financing at Bank Millennium S.A.

[4.b Disclose Scope 1, Scope 2, and, if appropriate, Scope 3 greenhouse gas (GHG) emissions, and the related risks]

The Bank calculates greenhouse gas (GHG) emissions based on the international GHG Protocol standard, which is a recognized system that allows for the measurement of CO₂ emissions and other gases that affect the greenhouse effect.

The detailed data and methodology for calculating GHG emissions that the Group discloses can be found in the report on in Section 2.2.2. "Greenhouse Gas Emissions."

[4.c. Describe the targets used by the organization to manage climate-related risks and opportunities and performance against targets]

In line with its 2022-24 strategy, the Bank has set out to actively support customers in their decarbonization efforts, and to provide 2 billion zlotys of financing to the Bank's and the Bank's Group's customers for sustainable and transformational projects between 2022 and 2024.

The Bank is taking proactive measures that target building a portfolio of assets that finance environmentally sustainable activities, while adhering to the Environmental Policy and Responsible Financing Principles. Also to this end, the Bank carried out a comprehensive project in 2023 to build and implement a process for classifying green assets - based on the Bank's internal business criteria based on best market practices and based on the EU Taxonomy.

As part of its 2022-2024 strategy, the Bank has set specific reduction targets in the area of greenhouse gas emissions. These commitments include:

- 50% reduction in direct emissions (Scope 1) in 2022 compared to the 2020 base, responding to increasing regulatory requirements to reduce the carbon footprint.
- Achievement of a state of climate neutrality in direct emissions by 2027
- Attainment of full climate neutrality (Scope 1, 2 and 3) by 2050

These goals are consistently implemented, as described in chapter 2.2.2 "Greenhouse gas emissions".

The set targets are part of the Bank's Group's integrated approach to sustainability. Details of activities in this regard are documented and reported as part of the annual ESG Report.

1.7. KEY AWARDS AND ACHIEVEMENTS IN 2023



The CSR Golden Leaf

Bank Millennium's consistent activities for sustainability and measurable successes in limiting the consumption of resources have once again been appreciated with the CSR Golden Leaf from Polityka weekly. The CSR Golden Leaf is awarded to companies, for which implementation of guidelines contained in the ISO 26000 standard is a key component of strategic actions in business and in relations with stakeholders, employees included. The companies rely in their Activities on local and global best management practice and follow international standards.



Millennium Group for the fourth time distinguished in the Bloomberg Gender-Equality index

Banco Comercial Portugues entered the international Bloomberg Gender-Equality index for the fourth time in a row. In 2023, it achieved its best result so far. It is higher than the results reported by 73% of companies included in the index. The high position of Banco Comercial Portugues was due to data from its three companies: Bank Millennium, Millennium bcp, Millennium Bim.



Bank Millennium is the best bank in Poland according to Global Finance Magazine

Bank Millennium was again awarded by the prestigious Global Finance. The magazine honoured Bank Millennium with the title of The Best Bank in Poland for 2023. The winners of this year's jubilee Global Finance awards are those banks that have carefully listened to the needs of their clients in difficult markets and achieved good results, laying the foundations for future success. The winning organizations managed their assets and liabilities prudently, taking into account scenarios of rapidly changing interest rates.



Bank Millennium second in the Best Employers Poland 2023 ranking in the category "Banks and financial services"

Bank Millennium again came second on the ranking list of best employers in banking and financial services and 32nd among all companies in the 3rd edition of the Best Employers Poland 2023 ranking prepared by Forbes Poland and Statista. The ranking was prepared according to the proprietary method of Statista and Forbes. The basis for awarding the distinction were direct recommendations from employees of the surveyed companies.



The Golden Bank 2023 title for Banku Millennium

Bank Millennium awarded the Golden Bank 2023 title for the best multi-channel service quality in the Golden Banker 2023 ranking. According to the ranking organizers, Bank Millennium is a bank from the very top, and the award was granted for persistent and systematic efforts on continuous improvement of the service. Bank Millennium was on the podium in all the categories that make up the main prize, and it was the best in two of them.



Bank Millennium in the Top 10 in the 17th edition of the Ranking of Responsible Companies

Bank Millennium was once again at the forefront of the Ranking of Responsible Companies - prestigious listing of the largest companies in Poland, assessed in terms of quality of responsible management according to ESG guidelines. In the general classification, Bank Millennium moved up two positions vs the last year.



Bank Millennium was also recognized as European Climate Leader 2023

Bank Millennium's sustainability and environmental activities were recognized by the Financial Times and Statista. Bank Millennium is the only company from Poland included among European Climate Leaders 2023. European Climate Leaders is a list of 500 companies from 33 European countries. It features companies that, among other things, achieved the largest reductions in GHG relative to revenues in 2016-2021 and are transparent in reporting their emission reduction activities.



Bank Millennium is the best digital bank in Poland according to Global Finance Magazine

In this year's edition of World's Best Digital Banks, organised by Global Finance Magazine, Bank Millennium was considered The Best Consumer Digital Bank and The Best SME Banking in Poland, as well as The Best Consumer User Experience (UX) Design and The Best Integrated Corporate Banking Platform) in Central and Eastern Europe. Bank Millennium's mobile app was considered to be the best in Poland. The Bank also won in 8 other competition categories.

Bank Millennium is the best bank in Poland according to Newsweek



Bank Millennium is the winner of this year's Newsweek's Friendly Bank ranking, winning in both ranking categories - „Bank for Kowalski” and „Remote Banking”. Bank's winning the “Bank for Kowalski” category was unquestionable. The Bank achieved 90 per cent of the maximum number of points, and in most aspects of the quality of service it had the best or near-best result in the entire group. Bank Millennium has won in the “Remote Banking” category for the second year in a row. Bank was also the undisputed winner in this category, scoring as many as 91 per cent of points. According to the organisers, the bank's advantage over its next rival was over 26 points.

The 2nd place in the Forbes Company-Friendly Bank ranking



Bank Millennium took second place in the Forbes Company-Friendly Bank ranking, moving up another two positions compared to last year. Forbes' Company-Friendly Bank is a ranking assessing the quality of service for corporate clients, prepared on the basis of the mystery shopper method.



Service Quality Star again for Bank Millennium

For another year in a row, the Bank was among the companies honoured with the title of Service Quality Star, awarded to the most friendly companies in Poland on the basis of a consumer satisfaction survey. The award given by the Polish Service Quality Standard means that the Bank represents the highest standards of service, stands out from the competition, and the Millennium brand has gained consumer recommendations.

1st place for the team of economists in the REFINITIV ranking

1 miejsce zespołu ekonomistów Banku Millennium w rankingu REFINITIV



In the Refinitiv (formerly Reuters) ranking, a team of economists led by Grzegorz Maliszewski, which also includes Andrzej Kamiński and Mateusz Sutowicz, again took 1st place in macroeconomic forecasts for 2022. Additionally, in the ranking of currency rate forecasts on the markets of Central and Eastern Europe, the team was ranked 5th, ahead of, among others, Citibank, Goldman Sachs and Bank of America.

STARLINE AWARDS FOR REUTERS POLLS FROM REFINITIV The gold standard in forecasting.

Bank Millennium has been included in this year's Financial Times Diversity Leaders Ranking



Bank Millennium was included in the Financial Times' "European Diversity Leaders" ranking. This is a list of European companies prepared periodically by the elite business and financial daily in cooperation with the research company Statista. The "Europe's Diversity Leaders 2024" ranking presents a list of 850 companies that received the highest score in the survey. Bank Millennium was ranked 262nd on the list, reaching 73.36 points. We are in the sixth position in the ranking among Polish companies, but we are the best in the domestic banking sector.

Bank Millennium awarded by Euromoney magazine for best digital solutions in Poland



Bank Millennium was named the best bank in the area of digital solutions in Poland. The award was given in this year's edition of the ranking compiled by the editors of Euromoney magazine. The authors of the ranking recognized the Bank's efforts to meet the changing needs of its clients and to continuously improve its digital offer, especially its mobile application.

Bank Millennium among the World's Most Trustworthy Companies in 2023



Bank Millennium was ranked among the world's most trustworthy companies in 2023. World's Most Trustworthy Companies 2023 is a list of companies selected on the basis of a holistic approach to assessing their trustworthiness. The organizers considered three main pillars of public trust: client trust, investor trust and employee trust. Bank Millennium was ranked 25th among all companies included in the list.

Bank Millennium awarded for ESG activities by UN Global Compact



The UN Global Compact Network Poland (UN GCNP) has awarded Bank Millennium for its activities for sustainability. The Bank received the award in recognition of its commitment to climate change mitigation and sustainable development for the benefit of future generations. The award also includes effective cooperation within the framework of programs implemented by the UN GCNP.



Bank Millennium employees triumphed in the prestigious Polish Contact Center Awards

We won no less than 6 awards in the Customer Communication section in the competition organised by Polish Marketing Association SMB. Polish Contact Center Awards is the most important plebiscite of the Polish contact center and customer care/service sector.



1st place for the Best Distributor of structured products in Poland and 1st place for the Best Distributor in Eastern Europe

In this year's edition of the SRP European Awards 2023 - a prestigious international competition for the structured products industry, we took 1st place in the Best Distributor in Poland category and 1st place in the Best Distributor Eastern Europe category.

1.8. DEFINING THE CONTENT OF THE REPORT - DIALOGUE WITH STAKEHOLDERS

[GRI 2-29, 3-1, 3-2] The process of defining the report's contents preceded the writing of the report. It consisted of identifying, prioritizing and validating the key aspects of the operations of the Bank Millennium Group in the business, environmental, employee and social areas. 30 reporting aspects aligned to the Bank Millennium Group's operations have been identified based on i.e. the topical scope of the GRI Standards and sustainable development practices and trends in the financial industry. These aspects are listed below.

BUSINESS AREA

- Role of ESG issues, including responsible financing, in the Bank's business strategy,
- Bank's tax policy,
- Availability of the Bank's products and services, in particular to the digitally excluded individuals, the disabled and seniors,
- Accurate and transparent information for the Bank's clients, ethical marketing and sales,
- Innovation and development of new technologies by the Bank,
- The Bank's confidentiality in its customer relations; measures to prevent the loss of customer data,
- Security arrangements for funds entrusted to the Bank,
- Activities undertaken by the Bank to prevent corruption.

ENVIRONMENTAL AREA

- The Bank's climate impact and the risks and opportunities for its business related to climate change,
- The Bank's energy consumption and ways to reduce it,
- Environmental education activities undertaken by the Bank,
- The Bank's impact on biological diversity,
- The Bank's water consumption and ways to reduce it,
- Greenhouse gas emissions related to the Bank's activities and ways to reduce them,

- Raw materials and commodities used by the Bank,
- Minimization of the Bank's waste and recycling.

EMPLOYEE AREA

- Conditions of employment at the Bank (benefits, parental leaves, employee turnover),
- Informing and consulting Bank employees,
- Employee health and safety,
- Training and support for employee development,
- Diversity and equal opportunity in access to positions in the Bank; equal pay for men and women,
- Mitigation of potential discrimination cases by the Bank,
- Ensuring freedom to associate and conduct collective disputes for the Bank's employees,
- Wages of entry-level employees of the Bank (in relation to the minimum wage).

SOCIAL AREA

- The Bank's relations with and impact on local communities,
- Social projects of the Bank Millennium Group and the Bank Millennium Foundation,
- Volunteering organized by the Bank and initiatives of its employees,
- Sponsorship and charitable activities of the Bank,
- Consideration of ESG factors in the Bank's selection of suppliers,
- Financial and in-kind support provided by the Bank to political parties and politicians.

These aspects were prioritized through two complementary processes: review of the internal perspective and review of the expectations of external stakeholders.

The internal perspective was defined by the male and female representatives of the staff and management of the Bank Millennium Group by using an anonymous web-based questionnaire. This research was conducted from 8 December 2023 to 22 December 2023. In total, 51 persons took part in this research.

The study of expectations of external stakeholders was also conducted in the form of an anonymous online questionnaire. The request to take part in the process was sent to the male and female representatives of the following groups of stakeholders:

- Vendors / business partners
- Media
- Clients
- Cultural institutions
- Institutional investors
- Business organizations
- Public institutions
- Auditors
- Universities / students
- International organizations
- NGOs
- Industrial organizations

When selecting the groups of stakeholders included in this process, the current stakeholder matrix was used as the basis (more information on this subject in chapter 3.6. "Social environment"). The

survey was carried out on from 8 December to 22 December 2023. Responses were received from a total of 15 individuals.

Significant reporting topics

The significant reporting topics presented below were selected by taking into consideration the results of the processes described above. Additionally, non-financial reporting trends, TCFD guidelines on reporting climate-related issues and regulations of the accounting act were taken into consideration. Following an analysis of relevant topics, the Bank decided to describe some aspects in greater detail in the report (presenting both the management approach and performance data), despite the lower rating given by stakeholders in the survey. This includes, among other things, the consumption of raw materials and commodities, water consumption and greenhouse gas emissions.

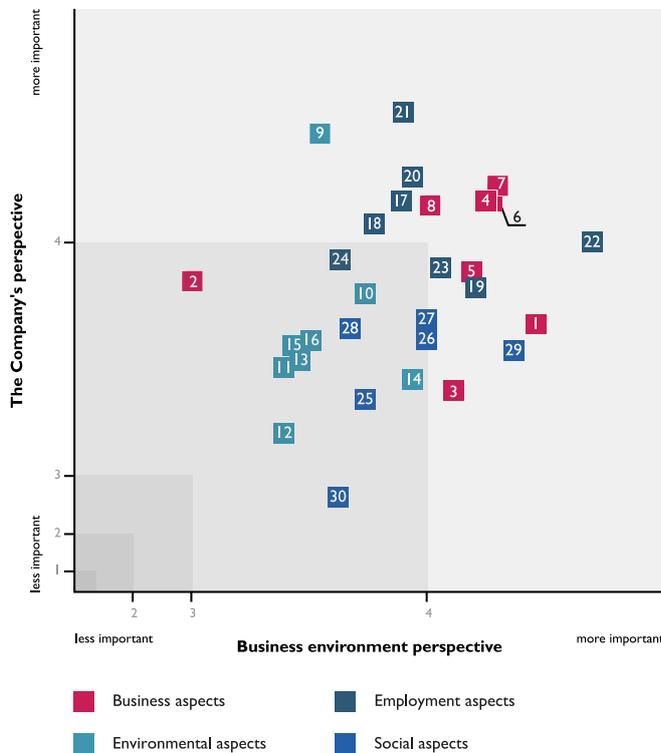
External stakeholders rated the following topics highest:

- Role of ESG issues, including responsible financing, in the Bank’s business strategy,
- Wages of entry-level employees of the Bank (in relation to the minimum wage).
- Security arrangements for funds entrusted to the Bank,
- Consideration of ESG factors in the Bank 's selection of suppliers,
- The Bank 's confidentiality in its customer relations; measures to prevent the loss of customer data,
- Innovation and development of new technologies by the Bank,
- Availability of the Bank’s products and services, in particular to the digitally excluded individuals, the disabled and seniors.

Topics rated highest from an internal perspective:

- Training and support for employee development,
- Conditions of employment at the Bank (benefits, parental leaves, employee turnover),
- Security arrangements for funds entrusted to the Bank,
- Activities undertaken by the Bank to prevent corruption.
- Employee health and safety,
- Accurate and transparent information for the Bank’s clients, ethical marketing and sales,
- The Bank 's confidentiality in its customer relations; measures to prevent the loss of customer data.

Map of material topics



- 1 The role of ESG factors, including responsible financing, in the bank's business strategy
- 2 Bank's tax policy
- 3 Availability of the bank's products and services, in particular for digitally excluded people, people with disabilities and seniors
- 4 Reliable and transparent information to the bank's customers, ethical marketing and sales
- 5 Innovation and development of new technologies by the bank
- 6 Maintaining confidentiality by the bank in relations with customers; actions to prevent the loss of customer data
- 7 Solutions for the security of funds entrusted to the bank
- 8 Activities undertaken by the bank to prevent corruption
- 9 The bank's impact on the climate as well as the risks and opportunities for its business related to climate change
- 10 Energy bank consumption and ways to reduce it
- 11 Activities undertaken by the bank in the field of environmental education
- 12 The bank's impact on biodiversity
- 13 The bank's water consumption and ways to reduce it
- 14 Greenhouse gas emissions related to the bank's operations and ways to reduce them
- 15 Raw materials and materials used by the bank
- 16 Minimizing the amount of waste produced by the bank and recycling
- 17 Terms and conditions of employment at the bank (benefits, parental leaves, employee turnover)
- 18 Informing and consulting of the bank employees
- 19 Health and safety of the bank employees
- 20 Training and supporting the development of the bank employees
- 21 Diversity and equal opportunities in access to positions at the bank; equal pay for men and women
- 22 Reducing potential cases of discrimination by the bank
- 23 Guaranteeing the right of the bank employees to associate and conduct collective disputes
- 24 Remuneration of the lowest-level bank employees (in relation to the minimum wage)
- 25 The bank's activities related to the support of citizens of Ukraine
- 26 The bank's relations with local communities and impact on them
- 27 Social programs of the Bank Millennium Group and the Bank Millennium Foundation
- 28 Volunteering organized by the bank and initiatives of its employees
- 29 Sponsoring and charity activities of the bank
- 30 Taking into account ESG factors in the process of selecting suppliers by the bank
- 31 Financial and material support provided by the bank to political parties and politicians

Significant topics (the report includes a description of the approach to managing these topics, as well as the resulting data):

- Role of ESG issues, including responsible financing, in the Bank's business strategy,
- Wages of entry-level employees of the Bank (in relation to the minimum wage).
- Security arrangements for funds entrusted to the Bank,
- Consideration of ESG factors in the Bank's selection of suppliers,
- The Bank's confidentiality in its customer relations; measures to prevent the loss of customer data,
- Innovation and development of new technologies by the Bank,
- Availability of the Bank's products and services, in particular to the digitally excluded individuals, the disabled and seniors,
- Training and support for employee development,
- Conditions of employment at the Bank (benefits, parental leaves, employee turnover),
- Activities undertaken by the Bank to prevent corruption,
- Employee health and safety,
- Accurate and transparent information for the Bank's clients, ethical marketing and sales.

Other aspects (concise information in the report):

- Bank's tax policy,
- The Bank's climate impact and the risks and opportunities for its business related to climate change,
- The Bank's energy consumption and ways to reduce it,

- Environmental education activities undertaken by the Bank,
- The Bank's impact on biological diversity,
- The Bank's water consumption and ways to reduce it,
- Greenhouse gas emissions related to the Bank's activities and ways to reduce them,
- Raw materials and commodities used by the Bank,
- Minimization of the Bank's waste and recycling.
- Informing and consulting Bank employees,
- Diversity and equal opportunity in access to positions in the Bank; equal pay for men and women,
- Mitigation of potential discrimination cases by the Bank,
- Ensuring freedom to associate and conduct collective disputes for the Bank's employees,
- The Bank's relations with and impact on local communities,
- Social projects of the Bank Millennium Group and the Bank Millennium Foundation,
- Volunteering organized by the Bank and initiatives of its employees,
- Sponsorship and charitable activities of the Bank,
- Financial and in-kind support provided by the Bank to political parties and politicians.

[GRI 3-2] Compared to the report for 2022, the following issues have been added to the list of material topics:

- Role of ESG issues, including responsible financing, in the Bank's business strategy,
- Consideration of ESG factors in the Bank's selection of suppliers,
- Activities undertaken by the Bank to prevent corruption,
- Wages of entry-level employees of the Bank (in relation to the minimum wage).

Compared to the 2022 report, the following topics were not included in the list:

- Social projects of the Bank Millennium Group and the Bank Millennium Foundation,
- Environmental education activities undertaken by the Bank,
- Diversity and equal opportunity in access to positions in the Bank; equal pay for men and women,
- Sponsorship and charitable activities of the Bank,
- Informing and consulting Bank employees,
- Mitigation of potential discrimination cases by the Bank.

The set of significant topics has changed compared to the previous reporting period as a result of research into the internal perspective and expectations of external stakeholders.

[GRI 2-29] Effective and valuable relationships with stakeholders are a priority for the Bank, that is why the Bank both examines their expectations as to reporting issues related to sustainable development that interest them, and provides them with feedback on how the information obtained from them translates into the actual content of the report.

[GRI 2-29] To ensure the involvement of all stakeholder groups, the Group takes into account potential barriers to communication. The Group has introduced standards for the use of understandable communication and plain language in particular areas of communication with stakeholders and places great emphasis on its understandability, taking into account the needs of people without specialized knowledge, as well as its suitability for various age groups and education levels. This process is supported by employee communication training.

[GRI 3-3] At the Bank Millennium Group, we believe that as a Group we can have a significant role and influence our stakeholders in many social and economic matters.

When considering the adverse environmental impacts of Bank Millennium Group's operations, we focus primarily on the impacts caused by the Group's typical banking operations, which consume resources, generate waste and emit greenhouse gases. In this respect, we have made a commitment to take measures to reduce our carbon footprint and we are consistently implementing these measures.

The main value we offer to our clients is the opportunity to finance their needs and projects as individuals and households, or in their business activities. This is how we impact the economy in a positive way, by supporting the creation of new businesses and new jobs and maintaining or improving the competitiveness of the existing ones. In this context, we also note the very important and the critical role of banks in financing the green transition that will be required to ensure the well-being of the future generations. These activities also affect the stabilization of the business cycle. It is in these aspects that we see our long-term positive impact, both actual and potential, on many stakeholders. In addition to businesses, individuals are an equally important client group. We finance their housing and other essential needs through savings and investment products.

We recognize the importance of accessibility and focus on the digitalization and inclusiveness of the products we offer. We are committed to the United Nations Sustainable Development Goals, which are reflected in our strategic actions across the Bank Millennium Group. We are constantly seeking innovative products and distribution channels that are inclusive (prevent exclusion) and we strive to improve our approach to customer service. The Bank is a place where our clients can get help in dealing with public administration and access e-government services. Clients can submit official applications through the electronic banking system (applications under the Family 500+ (currently 800+) program, Good Start 300+, RKO, a nursery subsidy, login into the PUE ZUS platform, Trusted Profile, Millennium ID).

As part of our social impact, we are committed to supporting the development of local communities - for this purpose we established the Bank Millennium Foundation, which carries out a number of educational, charitable and volunteer activities. We get our employees involved in these initiatives, which allows them to use their individual resources and potential, while giving them a sense of making their own positive impact on their community. The involvement of the Bank and its employees in community activities is proof that collective action produces measurable, meaningful results.

We believe that the Bank has a special responsibility to raise awareness on a range of business, economic and environmental issues. We do this by working with a variety of partners and sharing our expertise with our stakeholders, mainly our clients and employees. The Bank's unique initiatives include the report entitled "Millennium Eco-Index - the eco-innovation potential of the regions", which is discussed in more detail in section 2.5 "Ecological education".

At the Bank Millennium Group, we recognize that it is essential for us to ensure the security of the funds and information entrusted to us, especially personal data, in order to maintain the trust of our stakeholders.

In subsequent reporting periods, the Bank plans to develop and improve the process of monitoring actions taken to manage impacts and to track the effectiveness of actions taken in relation to identified areas of impact.



2. ENVIRONMENT

2.1. ENVIRONMENTAL IMPACT MANAGEMENT

Bank Millennium is guided by the United Nations Sustainable Development Goals, among which climate protection is one of the key issues. Environmental and climate protection initiatives have for years been part of Bank Millennium Group’s business strategy and are in line with the approach of the parent company - Banco Comercial Portugues (Millennium BCP).

The Bank is of the opinion that environmental and climate protection issues concern many areas of the Bank’s operations and are an integral part of its business. Due to the importance of these issues, the development of ESG strategies and policies is under the direct supervision of the Chairman of the Management Board.

Bearing in mind the growing significance of sustainable development for the Bank Millennium Group’s business, including climate-related issues, the Bank established within its structures the Sustainable Development Committee and the Sustainability Department. These units are described in “Management Approach to Sustainable Development” section.

2.1.1. CLIMATE ISSUES IN THE BANK MILLENNIUM GROUP'S STRATEGY

Climate and environmental goals were incorporated in the Group’s new strategy for 2022-2024 as well as in the “ESG Strategy of the Bank Millennium Group for 2022-2024”, which builds on and specifies in greater detail the environmental, social and governance goals presented in the Strategy for 2022-2024 “Millennium 2024: Inspired by People”.

In the “Environmental Protection” pillar, we have set strategic goals in the following areas:

- Striving for climate neutrality
- Reduction of resource consumption
- Product offering supporting sustainability
- Responsible lending policy
- Partnership with organizations
- Educational activities

The climate protection goals adopted by the Group include, among others, a reduction of its own greenhouse gas emissions by 50% in 2022 compared to 2020, achievement of climate neutrality in terms of its own emissions (by 2027) and full climate neutrality (by 2050). Its strategic objectives also include active support for decarbonization efforts of the Bank’s clients and granting PLN 2 billion of financing for sustainable and transformational projects for the clients of the Bank and the Bank’s Group over 3 years.

2.1.2. ENVIRONMENTAL POLICY OF THE BANK MILLENNIUM GROUP

A few years ago, the Bank decided to significantly reduce exposures financing the coal industry. As a result, exposures financing coal mines, industries directly related to coal mining and coal-burning power plants are close to zero. At the end of 2023, Bank Millennium Group's exposure to these industries accounted for less than 0.1% of the corporate portfolio and per mille of the entire Bank Millennium Group’s portfolio (including both on-balance sheet and off-balance sheet exposures).

Moreover, the Bank Millennium Group's exposure to crude oil and natural gas mining, service activities supporting this mining and the production and processing of crude oil and natural gas mining products constitutes 0.2% of the corporate portfolio and less than 0.1% of the entire portfolio of the Bank Millennium Group (covering both on-balance sheet and off-balance sheet exposures).

The Group implemented “**Environmental Policy of the Bank Millennium Group**”, which defines 3 main areas of its environmental activity:

The Bank’s own environmental activities

The Bank Millennium Group minimizes its environmental footprint through rational management of materials and waste, monitoring the use of water, energy and fuels, introducing environmentally-friendly solutions in its operations, by encouraging employees, customers and business partners to participate in environmental campaigns.

Environmentally-friendly products and responsible financing

The Group supports the implementation of environmental goals by introducing profiled products to its offer. Bank Millennium Group does not finance new coal mines and coal-fired power generation projects, except for new projects related to reduction of pollution. New financing in the energy sector is only possible if it serves the commitment to carbon-free energy sources and the energy transition to carbon-free energy sources.

At the same time, the Group has for many years supported the financing of environmentally friendly and energy-saving investments, including those related to the replacement of coal-fired power generation with low-emission energy sources and modern energy infrastructure, concerning renewable energy sources, reducing pollutant emissions and supporting energy efficiency, especially in energy-intensive and high-emission industries, in the field of low-emission motor vehicles.

The Bank’s clients are obligated not to use funds from the loan in any way linked to the activities mentioned on the EBRD Environmental Exclusion List. They are also obliged to obtain and maintain

all the necessary permits relating to protection of the environment in connection with their business activity and conduct their business activity in compliance with any environmental regulations any relevant laws, standards and other regulatory requirements at the nation-wide and local level with respect to protecting the environment, health and safety as well as rules of social conduct.

Environmental education

Employees, clients and business partners receive communication increasing environmental awareness. Where justified, environmental clauses are used in agreements with product suppliers.

2.1.3. BIODIVERSITY

Environmental issues, including biodiversity, are addressed in the Bank’s commitments and policies, including the Sustainability Policy and Environmental Policy of the Bank Millennium Group. We constantly analyze our environmental impact and take comprehensive steps to minimize our negative impacts. Our business strategy sets ambitious greenhouse gas emission reduction targets. We consistently meet these targets (see also section 2.2.2 “Emissions of greenhouse gases”). We are continuously reducing the use of resources in our operations (water, plastic, paper, electricity) and have rebuilt our vehicle fleet (replacing combustion engine cars with less hybrid or electric vehicles that are less carbon-intensive). We are committed to supporting our clients in their ongoing decarbonisation processes, by financing ongoing projects that support green transformation.

In this context, the Bank Millennium Group has adopted the “Principles for Responsible Financing” and recognizes that there are certain sectors of activity or projects, which do not correspond to the Group’s commitment to protect the environment and preserve biodiversity. Accordingly, both exemptions and restrictions have been defined, which should be considered when making financing decisions. The Bank Millennium Group does not finance projects in the following categories of activities:

- activities that are illegal under national or international law, including the production of or trade in products that are deemed illegal,
- businesses and activities related to unlicensed trade in wildlife or endangered species.

When financing projects with certain characteristics or in sectors with a potentially higher environmental impact, the Bank’s decision is subject to additional conditions, including in the following areas:

- businesses and activities that produce, process or export/import hazardous materials or substances (in accordance with specific national or international regulations),
- oil extraction projects,
- businesses and activities related to the production of and trade in timber from protected areas of native tropical forests.

The Group also adheres to the commitments made in the Environmental Policy, as further discussed in section 2.1.2, “Environmental Policy of the Bank Millennium Group”.

The Bank Millennium Group does not own or lease any real estate in protected areas or occupy any property, which is subject to special protection.

The Group cooperates with many business partners as the buyer of various products and services from diverse market segments. Promoting a culture of responsible consumption: Bank Millennium Group has adopted, as part of its “Sustainability Guidelines for Suppliers”, a set of requirements for suppliers covering sustainability issues, including environmental issues.

51At Bank Millennium Group, we are aware the importance of environmental education and raising awareness of sustainability topics. A detailed description of our activities in this regard is provided in section 2.5, “Environmental education”. We also attach great importance to the involvement of our employees in environmental initiatives. The theme of this year’s employee volunteering campaign was “Protecting our planet”. As part of its eco-volunteering activities, the Bank Millennium Foundation aimed to raise environmental awareness and promote ecological values such as: waste separation, the greening of spaces, the protection of animals and forests, as well as raising public awareness of environmental issues.

As part of the initiatives under the Our People’23: Save the Planet’ program, our volunteers have taken part in various environmental projects, such as building and running an apiary, cleaning up a landscape park, supporting a hedgehog conservation program, planting honey-producing bulbous plants, building houses for pollinating insects, and building bird feeders and nesting boxes.

As part of our commitment to environmental issues, the Group also relies on valuable partnerships, such as our cooperation with UNGC Poland as part of the Climate Positive program, or our cooperation with WWF Poland (more information in section 2.2.3 “Environmentally-friendly products and responsible financing”).

2.2. REDUCTION OF THE ENVIRONMENTAL IMPACT OF THE BANK’S OPERATIONS

Bank Millennium Group views its responsibility for the climate as an external as well as internal commitment. In addition to the activities described above and the adopted environmental policy, the Bank actively implements green and innovative solutions in its premises and reduces consumption of resources. [GRI 304-1] The Bank Millennium Group does not own or lease any real estate in protected areas or occupy any property, which is subject to special protection.

The Bank attaches great importance to reducing the level of emissions from the buildings it occupies for the conduct of its business. In September 2023, the modernized building in Gdańsk at Al. Grunwaldzka 19/23 received the LEED GOLD certificate. The certified Head Office was the Bank’s flagship investment project, which included optimization of the real estate portfolio and modernization of the Gdańsk Head Office buildings. The project was implemented in compliance with the prudent management concept, including assumptions such as optimization of space, efficient and environmentally friendly materials, thermo-modernisation of the building in line with the guidelines of the energy audit, as well as the Bank’s first own installation of photovoltaic panels.

2.2.1. REDUCTION OF RESOURCE CONSUMPTION

Reduction of material consumption [GRI 306-1, 306-2]

In Bank Millennium Group the process of purchasing and supplying the Group’s organizational units with materials necessary for the day-to-day operations is centralized. Maintaining purchasing discipline is possible through the use of an IT tool, REZA+, through which each ordered item is verified for legitimacy of purchase. This significantly reduces material consumption. Permanent monitoring of budget execution and defining limits to reduce purchases to the level of current consumption also makes a significant contribution to reducing material consumption. The process of ordering office supplies and equipment is governed by internal instructions and then reviewed for legitimacy of purchase and the Bank’s equipment standards. Purchases of equipment such as counters, shredders, refrigerators, microwave ovens and furniture (swivel chairs, desks, chairs and cabinets) are preceded

each time by a review of existing resources in terms of their reuse. This reduces the purchase of new appliances and furniture.

Proper organization of the centralized procurement process and consistent discipline in purchasing have helped to reduce consumption. The Bank takes measures on an ongoing basis to reduce the consumption of purchased materials, thereby reducing the negative impact on the environment.

Collection and regeneration of used toners from multifunction devices used in the Bank is provided by a third-party company. Waste paper and documents from the Bank's archives whose retention period has expired in a given year are transferred to companies specializing in the process of destroying documentation. 100% of the documentation destroyed in industrial equipment is recycled.

All types of electronic waste (ICT equipment, electrical equipment, data carriers), metal, plastic, wood, glass non-hazardous waste (other than municipal waste) are collected by a specialized company that has a permit for transport, collection and recovery of all types of waste. The business partner collecting ICT equipment, electrical equipment and data carriers acts in accordance with the provisions of the Waste Electrical and Electronic Equipment Act. Waste collected from Bank Millennium in 2023, excluding communal waste and paper, was recycled in 81% using the R12 recycling method. The R12 method entails selection, disassembly, processing and production of appropriate fractions, which are then sent for R4 recycling and metal recovery to authorized entities. Some devices are diagnosed and sent for reuse in Grade 1 recycling. Paper waste is fully recycled.

In its operations, the Bank complies with environmental protection regulations, i.e. the Act on Waste of 14 December 2012, as amended, Journal of Laws 2022, Item 669 of the consolidated version of 3 March 2022. In its operations, the Bank complies with environmental protection regulations, i.e. the Act on Waste of 14 December 2012, as amended, Journal of Laws 2023, Item 1587, i.e. of 7 July 2023. Following amendments to the Waste Act, in 2020 the Bank was listed on the Waste Database Register (BDO).

In 2023, we recorded a lower consumption of paper, even though the number of clients increased significantly year over year. The Bank permanently limits its consumption of paper through further digitization, supported by the omni-channel approach and close cooperation between digital and traditional channels, as well as through the optimization of processes. A marketing campaign encouraging clients to switch to electronic statements resulted in a significant decrease in the number of paper statements sent to clients by 16%. In 2023, a reduction in bulk and personal correspondence sent to clients was recorded, which was additionally reflected in the reduced consumption of paper and envelopes.

Millennium Leasing Sp. z o.o. also supports the paperless idea by actively promoting the einvoice service available to clients in the eBOK portal in place of sending hard copy invoices. Currently over 76% of all invoices are sent in electronic form via the portal. This signifies growth of 7.69% compared to the corresponding period of the previous year. In connection with the introduction of the option to download electronic invoices in the eBOK system, the Company reduced the consumption of paper for hard copy invoices by 56%.

The provision of water purifiers for Bank Millennium employees and water dispensers in the branches has further reduced plastic consumption. Water purifiers have been installed in 80% of our corporate facilities. For a few years now, for meetings in Bank Millennium's Head Office, catering is served in reusable dishes and cold drinks only in glass bottles. As part of educational campaigns, the use of reusable cups is being promoted in the Bank Millennium Head Office cafeteria. In the Bank's branches disposable plastic water cups for clients have been fully replaced with environmentally friendly BIO paper cups. These cups contain no plastic, are 100% biodegradable and compostable according to European standard EN13432. Cups can be refilled twice. In Bank branches, all plastic coffee stirrers

have been replaced with wooden ones. A small number of ex-EB branches still requires additional security measures for cash, i.e. plastic safety envelopes, since multisafes are not attached to the floor in these branches. The hand sanitizers introduced during the Covid-19 pandemic have remained with us permanently. The hand sanitizer containers and diffusers are made of plastic. A small number of field units is still supplied with water in plastic bottles, however these are ECO RPET bottles. At present, technical conditions restrict the possibility of installing water purifiers in those locations.

Type of materials	[GRI 301-1] Material consumption [kg] *	Bank Millennium				Change 2023/2022 [%]	Reasons for change
		2023	2022	2021	2020		
Renewable materials	Paper and paper rolls for operational needs	216,736	240,355	250,141	354,994	-9.8%	1. A decline in the number of paper bank statements by 16% yoy 2. Further digitization of documentation and optimization of processes 3. Clients confirm some of the transactions ordered in outlets and sign documents via the mobile application.
	Envelopes	58,936	76,321	75,055	116,064	-22.8%	Reduced volume of bulk and personal mailing to Bank clients.
	Cardboard	24,424	26,705	n/d	n/d	-8.5%	Procurement limits and discipline
Total consumption of renewable materials [kg]		300,096	343,381	325,196	471,058	-12.6%	
Non-renewable materials	Plastics	11,031	14,063***	16,073	40,911**	-21.6%	1. Consistent elimination of the purchase of water in plastic bottles as a result of the installation of water purifiers. 2. Elimination of plastic stirrers and disposable cups. 3. Less secure envelopes required for cash transports (an increasing number of branches migrating to the ACS format) - a lower number of branches requiring security measures for cash (no multi-safe permanently attached to the floor).
	Consumable materials for printing devices	30	54	0	1	-43.9%	Toners for the Bank's own devices: Field Collection and MM outlets on shopping center "islands". A third-party company is responsible for the purchase

	2023	2022	2021	2020	Change 2023/2022 [%]	
						of consumables for multi-function devices.
Batteries	863	822	794	760	4.9%	The slight increase is due to the performance checks carried out on the equipment. Batteries required, among others, for: - remote controls for alarms, electronic locks - automatic hand sanitizer dispensers, - for A/C remote controls.
Total consumption of non-renewable materials [kg]	11,923	14,939	16,867	41,672	-20.2%	
Total consumption of renewable and non-renewable materials [kg]	312,020	358,320	342,063	512,730	-12.9%	

* Without data on the use of recycled materials in the composition of purchased products

** Purchase of plexiglass dividers for all branches as a result of the Covid-19 pandemic

*** Including stretch film, bubble wrap and packaging tape with an "M", that is 396 kg

Type of materials	[GRI 301-1] Material consumption [kg]*	Bank Millennium Group				Change 2023/2022 [%]
		2023	2022	2021	2020	
Renewable materials	Paper and paper rolls for operational needs	224,302	247,534	259,608	364,592	-9%
	Envelopes	59,482	76,670	76,014	117,541	-22.4%
	Cardboard	24,424	26,705	0	0	-8.5%
Total consumption of renewable materials [kg]		308,208	350,909	335,622	482,133	-12.2%
Non-renewable materials	Plastics	11,125	14,550	16,532	41,371**	-23.5%
	Consumable materials for printing devices	30	54	0	1	-43.9%
	Batteries	870	829	806	785	5%
Total consumption of non-renewable materials [kg]		12,025	15,433	17,338	42,157	-22.1%
Total consumption of renewable and non-renewable materials [kg]		320,233	366,342	352,960	524,290	-12.6%

* Without data on the use of recycled materials in the composition of purchased products

** Purchase of plexiglass dividers for all branches as a result of the Covid-19 pandemic

Type of materials	[GRI 301-1] Material consumption [kg] *	Other Bank Millennium Group's companies				Change 2023/2022 [%]
		2023	2022	2021	2020	
Renewable materials	Paper and paper rolls for operational needs	7,566	7,179	9,467	9,598	5.4%
	Envelopes	546	349	959	1,477	56.3%
Total consumption of renewable materials [kg]		8,112	7,528	10,426	11,075	7.8%
Non-renewable materials	Plastics	94	487	459	459	-80.7%
	Consumable materials for printing devices	0	0	0	0	
	Batteries	8	6	11	25	19.3%
Total consumption of non-renewable materials [kg]		102	493	470	484	-76.3%
Total consumption of renewable and non-renewable materials [kg]		8,214	8,021	10,896	11,559	2.4%

* Without data on the use of recycled materials in the composition of purchased products

Waste generated as a result of business activity, i.e. municipal waste management and recycling - secondary use

The Bank segregates, depending on local regulations, waste into 3 to 5 groups: plastic, paper, glass, bio and mixed. In addition, containers for collection of batteries and small electrical waste have been set up in the offices of the Bank's Head Office in Warsaw. A campaign to collect large size electronic waste takes place once a year. Mixed municipal garbage is collected by the City using a pre-declared monthly number of containers. Recycling waste bins are available at all Bank locations, both branches and office buildings. All bins are properly labelled with educational signs with detailed waste segregation instructions to help employees segregate waste.

[GRI 306-3] Generated waste [kg] *	Bank Millennium			
	2023	2022	2021	2020
Municipal waste (detailed breakdown in the table below):	173,913	131,179	111,327	n/d
- non-hazardous	173,913	131,179	111,327	n/d
- hazardous	0	0	0	n/d
Generated waste sent for reuse and recycling	211,625	366,416	319,462	355,643
- non-hazardous	210,562	365,681	319,055	343,534
- hazardous	1,063	735	407	12,109
Total waste	385,538	497,595	430,790	343,534
- non-hazardous	384,475	496,860	430,383	343,534
- hazardous	1,063	735	407	12,109

*A detailed breakdown by waste fraction within a given waste group is presented in the tables below.

A detailed breakdown of generated municipal waste and waste sent for reuse and recycling, divided into fractions within non-hazardous and hazardous waste groups, in accordance with the classification of Waste Codes presented in the Act on Waste of 14 December 2012, as amended (Journal of Laws of 2023, Item 1587, i.e. of 7 July 2023), is presented in the tables below.

Similarly to previous years, managers of the buildings of the Head Offices in Gdańsk, Wrocław and Warsaw kept a register of waste in the following categories - metal and plastic, paper and glass, bio and mixed.

Municipal waste			
Generated waste [kg] *	2023	2022	2021
Paper	11,071**	15,624	10,861
Metal and plastic	3,567**	3,759	15,434
Glass	2,931**	1,524	15,600
BIO	7,129**	1,082	4,212
Mixed	149,215**	109,190	65,220
Total	173,913**	131,179	111,327

* Data from Bank Millennium's Head Office Building Managers Register (HQ: Warsaw, Wrocław, Gdańsk). No information on recycling rate available.

** Changes in the reported waste volumes in respective years are due to the unification of conversion factors for the respective recycling categories, an increase in the number of employees working in HQ offices after the pandemic and a temporary closure of spaces due to renovation works in 2022. The year 2023 presents complete data broken down into recycling categories.

Commentary on the volume of individual recycling categories:

a) for Building A in HQ Warsaw, details for the paper, metal and plastic, BIO and glass recycling categories come from the actual weights in BDO cards.

a) for Building B in HQ Warsaw, details for the paper, metal and plastic, BIO and general waste recycling categories come from the actual weights in BDO cards.

c) for all head office buildings, for recycling categories not included in the actual weights recorded in BDO cards, data from the acceptance reports stated in litres were used. Data stated in litres were converted into cubic meters and then into weights by applying appropriate conversion factors.

In 2023, the Bank allocated 348 items of assets (equipment and furniture) for reuse in the Bank's branches). The relocation of the Bank's head office in Gdańsk resulted in the need to change the furniture, which did not fit into the arrangement of the new Head Office facility and was not used in the Bank's other facilities; this is why it was slated for liquidation. In order to minimize as much as possible the amount of waste resulting from the liquidation of unnecessary furniture, the Bank organized the sale of the furniture, including chairs, cabinets, desks, containers, tables, chests of drawers, armchairs and bookcases, through a specialized company. The process of clearing the Gdańsk Head Office facilities was divided into two stages. The first one took place in July 2022 and was extremely successful, as was the second stage, carried out in January 2023. In January, the furnishing suitable for further use was placed on the sales platform in January. The campaign was preceded by messages in the Bank's internal channels. The furnishings of the Gdańsk Head Office was old and worn out, but the sale still attracted great interest. Employees and private buyers purchased nearly 69% of the furnishings slated for liquidation. They also organized the sale of furnishings to raise funds for 7 different charitable organizations and foundations, which was a great success. Ultimately, as much as 83% of the equipment was given a second life. Only 17% was recycled due to being worn out or damaged.

635 items of IT and computer hardware were given a second life in 2023. Out of this number 35 items were sold to the Bank's employees, 55 to external entities and 545 given to charitable institutions.

**[306-4] Generated waste sent for reuse and recycling
 (including hazardous waste listed in a separate table)**

Waste generated [kg]	Bank Millennium					Change 2023/2022 [%]	Reasons for change
	2023	2022	2021	2020			
ICT equipment and devices *	10,836	25,058	52,286	47,903	-56.8%	Continuation of the "Computer resale to Bank employees" program. Donation of computer hardware as part of charity campaigns	
Used-up equipment containing hazardous elements (including freon)**	567	557	71	5,181	1.8%	Modernization of Head Office facilities and disposal of furnishings that did not meet the Bank's standards and were worn out.	

Paper *	190,345	329,040	258,754	272,316	-42.2%	Smaller number of External Archive documents destroyed in connection with the expiry of the required storage period in 2023
Metal waste and, aluminum and cable *	4,926	9,467	1,884	9,998	-48.0%	Crossover and server racks for network devices and servers.
Plastics *	79	269	51	4,715	-70.6%	Plastic elements from liquidated ITC devices and hardware.
Glass *	0	6	0	828	-100%	
Furniture *	4,344	940	5,494	7,160	362.3%	Modernization of Head Office facilities and disposal of furnishings that did not meet the Bank's standards and were worn out.
Lead batteries **	496	178	336	6,928	178.2%	Modernization / relocation of HQ Gdańsk - server racks, UPS units
Waste printing toner*	0	662	586	614	-100%	
Cardboard packaging*	32	239	n/d	n/d	-86.6%	Cardboard boxes of devices and equipment remaining in branches.
Mixed concrete and brick rubble waste, waste from construction sites and renovations *	0	0	0	0		Responsibility for waste management related to facility conversions delegated to service providers who report directly to the BDO.
Total [kg]	211,625	366,416	319,462	355,643	-42.24%	
Recycled waste [%] ***	98%	97%	97%	96%		

* waste classified as non-hazardous according to the Waste Code classification set forth in the Act on Waste of 14 December 2012, as amended, Journal of Laws 2023 Item 1587, i.e. of 7 July 2023.

** waste classified as hazardous according to the Waste Code classification set forth in the Act on Waste of 14 December 2012, as amended, Journal of Laws 2023 Item 1587, i.e. of 7 July 2023.

*** percentage of waste in the table, including paper, is further recycled at processing facilities (non-recyclable waste has been disposed of in a specialized facility)

HAZARDOUS WASTE according to Waste Code classification according to the Act on Waste of 14 December 2012, as amended, Journal of Laws 2022 Item 699

Waste generated [kg]	Bank Millennium			
	2023	2022	2021	2020
Used-up equipment containing hazardous elements, including freons, HCFC, HFC	567	557	71	5,181
Lead batteries	496	178	336	6,928
Total waste	1,063	735	407	12,109

Waste generated not as a result of business activity

The annual campaign to collect electro-waste was organized in the Bank Millennium Head Office and enabled employees to give away unwanted equipment. The Administration and Infrastructure Department encouraged employees to do their annual clean-up by allowing a convenient way to hand over electro-waste. The campaign also involved private equipment and batteries. In addition, bottle and container caps are collected at the head offices and branches and then donated to a charitable cause. The caps collected in 2023 by Bank Millennium Group employees were donated to the Dom Rodzina Człowiek (Home, Family, Human) Association, which will sell them as recyclable material and donate the money for: material assistance for the poor and disabled, financing the purchase of prostheses, meals for poor families, financing tutoring for children from poor families or financing Christmas presents for poor families. The electrical waste and batteries collected in 2023 by employees have been 100% recycled by a specialist company.

Waste collections from employees [kg]	Bank Millennium Group					Change 2023/2022 [%]	Reasons for change
	2023	2022	2021	2020			
Electrical waste	150	232	200	250	-35	Due to the wide availability of collection sites, and lower building occupancy caused by the pandemic.	
Collection of batteries	100	102	150	300	-2	Due to the wide availability of collection sites, and lower building occupancy caused by the pandemic.	
Collection of plastic caps	67	123	230	n/a	-45	In 2021, we began collecting data on the number of caps donated.	

Monitoring energy, water and fuel consumption

After an analysis of the consumption of water, energy and fuels, measures are implemented to reduce consumption of these resources, inter alia through:

- Use of energy-efficient lighting in the head office and branches and automatic systems to reduce energy and water consumption in the head office building in Warsaw, which has been awarded the BREEAM certificate (Very Good level), and LEED Gold in Wrocław. Additionally, in Wrocław, Dali system (Digital Addressable Lightning Interface) is installed, which reduces operating costs and increases the comfort of work. Used both daylight supply sensors and occupancy sensors throughout the space, which contributes significantly to energy efficiency.
- In September 2023, we received the LEED Gold certificate, which confirmed that the furnishing of the office spaces opened in 2022 in Gdańsk at ul. Grunwaldzka 19/23 meets all the criteria of modern, energy-efficient and effective buildings fit for the 21st century. The certification process began long before the construction process. The detailed design, which was used as the basis for carrying out the renovation, was prepared in accordance with LEED guidelines, with the main consideration of applying a prudent approach to environmental solutions. Given the difficulties in the energy market, and emphasizing its commitment to people, the environment and society, Bank Millennium is introducing additional measures to reduce electricity consumption. It has decided to switch off light boards and advertising screens at its head offices and its branches nationwide after office hours. This campaign was promoted widely in the media, including social media (video, articles).
- In order to reduce fuel consumption, Bank Millennium Group has replaced all gasoline cars in its fleet with gasoline-powered hybrid models, while leased cars with diesel engines are replaced with gasoline hybrids. For business travel, low-emission means of transport (rail) are preferred and limits associated with the use of airplane transport are applied.

Methodology for calculating the annual consumption of utilities and fuel

The calculations of annual consumption of utilities are based on data on costs and quantities (in physical units) of consumption of the relevant utility. The method involves a consistent combination of known quantitative data and data calculated on the basis of relevant costs. The costs data, after reduction by the values for which consumption (measured in physical units) is known, are used to determine the consumption of utilities that are not known directly. This part of calculations uses the average prices of the relevant utilities calculated on the basis of a sample invoices for each kind of utility. The consumption is then allocated to Bank Millennium and the BM Group based on the known values associated with the Group's structure.

[GRI 302-1] Energy consumption [GJ]	2023	2022	2021	2020	Change 2023/2022 [%]	Reason for change
Electricity purchased						
Bank Millennium	59,779	72,323	76,979	83,621	-17.34%	Optimization of the number of branches and own buildings, reduction of the number of head office buildings and optimization of the Gdańsk HQ, introduction of technical equipment optimization.
Bank Millennium Group	65,027	80,112	87,265	94,936	-18.83%	
Electricity from RES *						
Bank Millennium	100%	100%	68%	n/d	0%	The Bank has purchased guarantees of origin of electricity, which it associates with a zero emission ratio.
Bank Millennium Group	100%	100%	68%	n/d	0%	
RES electricity generated in own renewable energy sources						
Bank Millennium	71	0	0	0	100%	In January 2023, the first own PV installation was launched, which has been installed on the roof of the Gdańsk Head Office at Grunwaldzka and is capable of covering more than 20% of its demand for electricity.
Bank Millennium Group	71	0	0	0	100%	
Heat energy purchased						
Bank Millennium	51,416	76,147	85,913	102,763	-32.48%	The decrease is due to the reduction in the number of branches, buildings, as well as the optimization of the modernized Head Office in Gdańsk and higher external temperatures in the heating season.
Bank Millennium Group	54,906	80,174	92,029	115,969	-31.52%	

Natural gas

Bank Millennium	5,294	6,013	6,600	6,821	-11.96%	Similarly as for purchased heat.
Bank Millennium Group	5,698	6,331	7,099	7,897	-10.01%	

Heating oil

Bank Millennium	309	412	334	240	-25.07%	Similarly as for purchased heat.
Bank Millennium Group	411	553	423	291	-25.69%	

Total energy used for heating purposes

Bank Millennium	57,019	82,572	92,848	109,824	-30.95%
Bank Millennium Group	61,015	87,059	99,553	124,157	-29.92%

Gasoline **

Bank Millennium	26,758	20,777	16,159	14,109	28.78%
Bank Millennium Group	30,200	23,848	19,019	18,070	26.64%

Diesel **

Bank Millennium	561	3,782	7,503	10,403	-85.16%
Bank Millennium Group	561	4,446	8,279	10,823	-87.38%

LPG **

Bank Millennium	674	3,117	4,146	3,376	-78.37%
Bank Millennium Group	674	3,117	4,154	3,376	-78.37%

Total energy used for transport purposes

Bank Millennium	27,993	27,676	27,808	27,888	1.14%
Bank Millennium Group	31,435	31,411	31,452	32,269	0.08%

Total consumption of energy from renewable energy sources

Bank Millennium	59,850	72,323	52,346	n/d	-17.3
Bank Millennium Group	65,098	80,112	59,340	n/d	-18.7

Total energy consumption from non-renewable energy sources

Bank Millennium	85,012	110,248	145,288	221,333	-23%
Bank Millennium Group	92,450	118,469	158,929	251,362	-22%

Total energy consumption

Bank Millennium	144,862	182,571	197,634	221,333	-20.69%
Bank Millennium Group	157,548	198,581	218,269	251,362	-20.70%

* The calculation method is described on page 84

** Values in liters are shown in the table below.

Fuel consumption [l]	2023	2022***	2021	2020	Change 2023/2022 [%]
Gasoline					
Bank Millennium	808,037	627,440	487,974	422,327	28.78%
Bank Millennium Group	911,988	720,167	574,344	540,896	26.64%
Diesel					
Bank Millennium	15,677	105,655	209,588	271,300	-85.16%
Bank Millennium Group	15,677	124,194	231,267	282,251	-87.38%
LPG					
Bank Millennium	24,568	113,601	151,133	131,415	-78.37%
Bank Millennium Group	24,568	113,601	151,415	131,415	-78.37%

Energy generated in own sources but not for own consumption [GJ]	2023	2022	2021	2020	Change 2023/ 2022 [%]	Reason for change
RES electricity generated in own renewable energy sources and transferred to the grid						
Bank Millennium	12	0	0	0	100%	In January 2023, the first own PV installation was launched, which has been installed on the roof of the Gdańsk Head Office at Grunwaldzka and is capable of covering more than 20% of its demand for electricity. Some of the energy, due to the working system of the installation had to be returned to the local grid.
Bank Millennium Group	12	0	0	0	100%	

[GRI 303-5] Water consumption*	2023	2022	2021	2020	Change 2023/2022 [%]	Reason for change
Bank Millennium	66,640	73,838	66,146	93,391	-9.7	Water consumption is strictly dependent on the number of employees staying at offices and branches; the lower consumption in 2023 was due to the hybrid work model still in effect, but mainly due to the decrease in the number of branches and office buildings and the installation of modern perlator taps in own buildings. Perlator taps (special attachments to taps that visually increase the flow of water through aeration) can save from 15% to 25% of water.
Bank Millennium Group	70,516	77,676	70,739	101,898	-9.2	

* no water consumption in drought-prone areas (water stressed areas).

The decrease in diesel fuel consumption is due to the fact that the year 2023, as well as 2022 and 2021, marked the expiry of many diesel car contracts acquired as a result of the merger with Euro Bank. The increase in gasoline and LPG consumption levels is, in turn, due to a considerable recovery in 2023 in business car use, which dropped significantly in 2020 due to the pandemic, as well as the fact that the fleet is replaced with gasoline hybrid cars (hybrids currently represent 100% of gasoline-fueled cars).

Rationalization of business travel is driven by the constraints of Bank-imposed modes of transportation and the approval path when a higher standard of transportation is used. Employees may use rail transport (PKP), and coach and bus transport (PKS and BUS). With regard to the process of ordering train and airline tickets, the Bank uses the support of an external company with which it has an agreement to handle business travel. For airplane and private car travel, a Management Board Member approval is required. Additionally, as part of the modernization of the Bank's Head Offices in Warsaw, Wrocław and Gdańsk, multimedia devices and Internet applications (e-learning training platform, MSTeams, Skype) are used to organize meetings and trainings, which translates into less business travel, which would show a much more significant growth than that actually recorded.

Business travel [km] *	Bank Millennium				Change 2023/2022 [%]
	2023	2022	2023	2020	
Air **	506,391	485,104	302,402	393,922	4%
Taxi	12,344	15,097	991	1,943	-18%
Railway **	2,938,928	1,693,785	725,916	1,105,957	74%
Bus	25,154	44,843.5	8,649	208,455	-44%
Private car	39,986	42,548	53,248	48,963	-6%

* data for Bank Millennium; the Subsidiaries do not maintain a register of km travelled

** the 2020 data have been updated according to the new methodology applied - see pages 87-88 for a description

In 2023, as in previous years, training away from the office was limited considerably and was mostly done through an e-learning platform.

The subsidiaries handle their business travel on their own.

Environmental activities

The Bank Millennium Group conducts a number of activities aimed at optimizing the use of energy, water, fuel and purchased materials.

Plastic

Measure	Description
Limiting plastic consumption	<ul style="list-style-type: none"> ▪ Popularity of payments using a virtual card, BLIK mobile payments and BLIK contactless payments in a mobile app reduces the need for plastic cards; ▪ Temporary card blocking option - a client who suspects to have lost a card may block it for some time until it is found instead of cancelling it; as a result there is no need to issue a new card. ▪ There are water treatment purifiers at the Bank's Head Office - no need to purchase bottled water; This initiative is continued and extended to field units as the outlets are modernized. ▪ Based on the average number of shipments sent out, a limit for secure plastic envelope orders was set for each of the Bank's organizational units.

Efficient management of available resources

- Reuse of resources allows the Bank to reduce the purchased quantities of furnishings (desk chairs), own devices (shredders and bill counters) and consumable materials (e.g. toners, hangers, inking ribbons).
- Appliances and equipment from closed down or remodeled branches are handed over for use in other outlets. In 2023, the Bank allocated 348 items of assets (equipment and furniture) for reuse in the Bank's branches).

Zero Waste - the second life of furniture

- The Bank organized the sale of the furniture, including chairs, cabinets, desks, containers, tables, chests of drawers, armchairs and bookcases, through a specialized company. In the process of clearing Gdańsk HQ facility in January 2023, equipment classified as fit for continued use Was posted on the sale platform. The campaign was preceded by messages in the Bank's internal channels. Even though the furnishing of the Gdańsk Head Office was old and worn out, the sale commanded great interest. Employees and private buyers purchased nearly 69% of the furnishings slated for liquidation. They also organized equipment sale to raise funds for charity, which was a great success. As much as 83% of the equipment was given a second life. Only 17% was recycled due to being worn out or damaged.

IT Tools

- The IT system supports verification of each purchase order for materials and office equipment in terms of the justification for the purchase and the defined limit, thereby contributing to reduced consumption of resources;

Recycling - donating operable computers to those in need and reselling IT devices and accessories withdrawn from use.

- In 2023, the Bank continued its work of donating computer equipment to schools, kindergartens and other educational institutions. Overall, 545 pieces of equipment have been donated since January 2023.
- In 2023, the program of resale of IT devices and accessories withdrawn from use to Bank employees was continued; 36 devices were sold overall (notebooks, phones).
- In 2023, there was also an initiative of selling retired devices to external entities. As part of this initiative, 55 devices/accessories were sold (ICT racks and multi-safes).

Paper

Action	Description
Restrictions on printing of documents	<ul style="list-style-type: none"> ▪ In branches, postings of internal transactions are recorded in the system - there is no need to print them out. ▪ The quantity of paper ordered to print cash and treasury transactions is controlled on an ongoing basis, based on monthly cash transaction reports; ▪ The automated ATM settlement process does not require related documents to be printed; ▪ Print volume monitoring - reports are sent to the units generating the highest print volumes so that reduction measures can be taken; ▪ Printing on company printers is possible only after the employee logs in to a specific device, which prevents accidental printing. ▪ Millennium Leasing plans to actively promote the eBOK service, including new functionalities (submitting applications, the document module) and access to e-invoices, in online campaigns (including own channels, social media). Handling as many cases as possible online can significantly reduce the amount of paper used and the carbon footprint.
Opening an account online using a selfie or open banking	<ul style="list-style-type: none"> ▪ The Bank provides the option to open an account online with a selfie or with proof of identity by logging into an account at another bank. Both processes are fully remote and require no printing of any documents.
Buying tickets on the mobile application	<ul style="list-style-type: none"> ▪ The Bank's clients may use the application to buy tickets for municipal transport, parking, highways and tickets to Helios cinemas. The tickets are stored within the application and they do not have to be printed out or use any paper tickets.
Digitization of mortgage loans	<ul style="list-style-type: none"> ▪ For more than a decade now, the Bank has been actively improving the mortgage loan application and maintenance process. A client applying for a loan can track the status of the application online, he/she may approve the application by SMS or use e-appraisal, which is an electronic property valuation document. Clients with an active loan may manage their loan remotely via Millenet and attach scans of an insurance policy without a need to deliver hard copy documents. Od 2023 roku klienci mogą również zdalnie zlecić wypłatę transzy kredytu, co nie wymaga drukowania dodatkowych dokumentów, jak to jest w przypadku zlecenia składanego w placówce banku.

Action	Description
Mobile authorization in Bank's outlets	<ul style="list-style-type: none"> ▪ The Bank allows some of the transactions ordered in branches to be authorized using mobile authorization. Some of the transactions requested in a branch may be approved in the bank's application by clients with an active mobile authorization option. The service continues to be expanded by adding further orders.
Opening and administering investment, credit or deposit products in remote channels	<ul style="list-style-type: none"> ▪ Bank Millennium clients may submit applications for credit products, open bank deposits or invest their savings through electronic channels. Clients can also complete the MiFID questionnaire online. In 2023, the remote process of applying for a credit card was improved.
Electronic circulation of internal documents	<ul style="list-style-type: none"> • By introducing IT systems for processing internal documents, the circulation of most paper documents has been eliminated in the Bank; • Processing client documentation (e.g. loan applications) is based on electronic copies of documents;
Actions aimed at reducing the number of printouts for clients	<ul style="list-style-type: none"> ▪ Electronic document circulation through Millenet for Corporates - the solution enables transferring and receiving digital documents and concluding agreements with the use of an electronic signature with a qualified certificate. This allows you to dispense with printing documents for signature; ▪ Some documents are posted on the Bank's website and in internet banking. Through internet banking, for example, the client is informed of changes to the terms of service (durable medium); ▪ Simplification of language in documents for clients, consolidation of documents (several instructions in one document, several agreements in one template); ▪ Access to e-government - official applications can be submitted through electronic banking, which reduces the use of paper (applications from programs: Family 500+ (currently 800+), Good Start 300+, RKO, subsidy for nursery, logging in to the PUE ZUS platform, Trusted Profile, Millennium ID); ▪ Possibility to pay motorway tolls and buy public transportation and parking tickets through the mobile application; ▪ Electronic statements - electronic bank statements are the default option for every new client concluding an agreement for bank products and services. It is possible to opt out of this option at a client's request. The Bank actively conducts campaigns promoting the use of electronic statements; ▪ The Bank promotes the use of electronic statements;

Action	Description
	<ul style="list-style-type: none"> ▪ Electronic application process for products: opening another bank account, cash withdrawals, loan application, setting up a deposit, etc.; ▪ Contactless phone payments with the possibility to virtualize plastic cards, BLIK contactless payments, and promoting cashless payments; ▪ Purchase of insurance products also in remote channels, where you can conveniently and intuitively purchase insurance fully online without the use of hardcopy documentation; ▪ When applying for a mortgage loan, scans of documents can be directly uploaded to the Bank's system by bank employees or they can be retrieved from public records and client's checking and savings account statements generated online. Clients may also deliver some documents, such as a statement from a checking and savings account in the electronic form to the bank's employee. ▪ Clients with a mortgage loan can attach scans or photos of their insurance policy through remote channels, without having to provide paper documents; ▪ The goodie smart-shopping platform launched by Bank Millennium makes it possible to browse stores' online offers and electronic newspapers instead of their hard copy counterparts. ▪ Online trade finance module - solution for corporate clients facilitating electronic orders and remote correspondence with the Bank; ▪ E-guarantee for business clients - is a bank guarantee issued in electronic form (PDF file) using a qualified electronic signature of two of the Bank's attorneys-in-fact; ▪ In Millennium TFI, transaction confirmations can be sent to the client electronically. The client has the option of specifying an e-mail address for receiving electronic transaction confirmations; ▪ The distributors with whom TFI has signed distribution agreements offer the possibility of purchasing fund units online (the purchase form for the client is electronic); ▪ Millennium Leasing offers their customers online service in the form of an eBOK (electronic Customer Service Office). As a result, clients can, among other things, download electronic invoices, monitor payments, create files with lists of contracts, installment plans, request certain matters related to a contract or leased item. In 2023, a new "Document Module" function enabling secure uploads and downloads of documents was added the site. Through this function, a client may sign a leasing agreement remotely by

Action	Description
	<p>using his/her qualified electronic signature. During 2023, the share of clients using the eBOK increased from 85% to 89%.</p> <ul style="list-style-type: none"> One of the key initiatives of Millennium Leasing is the popularization of e-Signature, introduced in 2020, as a form of signing leasing contracts. In 2023, the company used this method to sign 51% of its customer contracts for which such a possibility was provided, which accounted for 18% of the total number of contracts concluded.
Product sales via remote channels	<ul style="list-style-type: none"> Retail clients may apply for credit, savings, investment and insurance products using remote channels. They can also open accounts, including a company account, a currency account and an account for a child. Clients who want to open their own business can do it through the bank. On the website, individuals who are not the bank's clients may open an account or apply for a cash loan. The Bank's clients have been able to buy codes for online services and gift cards on the mobile application and in Millenet. Top-up codes are available in the application. The code must be entered on the shop's or service provider's website, with no need to print it out. In 2023, the Bank intensively developed its digital offer for businesses. Microbusinesses have access to additional services, such as leasing, POS and SOFT POS terminals, accounting integrated with banking. In 2023, the bank launched a new mobile application for the medium and large corporate segment. Corporate clients can apply for a payment card or open another account through the internet banking system. Clients applying for a loan can submit the required documentation electronically.

Share of electronic channels in the sales of key products

Personal accounts	Cash loans	Term deposits
40%	81%	96%

Increase in the number of clients using online services

	2023	2022	2021	2020	Change 2023/2022
All clients with access to electronic banking	4,279,725	4,029,156	3,489,972	3,230,769	+6.3%
Active electronic banking users	2,701,645	2,519,181	2,263,233	2,052,806	+7.2%
Clients who actively use mobile banking	2,473,365	2,240,077	1,920,883	1,658,554	+10.4%
Clients using Mobile Authorization	3,068,670	2,427,184	1,995,707	1,394,169	+26.4%
Clients using online statements	3,196,035	3,054,970	2,807,904	2,643,960	+4.6%
Clients with access to e-administration	1,407,852	1,133,697	1,058,813	664,695	+24.2%
Clients using contactless payments (registered)	1,155,562	1,065,749	811,267	580,720	+8.4%

Electricity and water

Action	Description
<p>Energy efficient buildings of the Bank's Head Office in Warsaw, Wrocław and Gdańsk</p>	<ul style="list-style-type: none"> ▪ The Warsaw Head Office buildings have the BREEAM certificate, the ones in Wrocław were awarded the LEED GOLD certificate. In September 2023, the modernized building in Gdańsk at Al. Grunwaldzka 19/23 received the LEED GOLD certificate. ▪ As part of the investment project executed in Gdańsk at Al. Grunwaldzka 19/23, the areas surrounding the building were recultivated, new vegetation was planted (627 items), and the existing plants were maintained. The existing Green Square with old trees was carefully maintained and benches were installed for the Bank's employees to rest. ▪ At the Bank's Head Offices located in Warsaw and Wrocław, smart building management systems (BMS) are installed, which support our efforts to optimize the consumption of utilities. ▪ At ul. Grunwaldzka 19 in Gdańsk, the first 25.3kwp photovoltaic system consisting of 69 modules was installed. ▪ Our entire head office space is equipped with LED lighting; we replaced nearly 14,000 fixtures (the total in the head office buildings in Gdańsk, Warsaw and Wrocław) using the old fluorescent technology with modern LED lighting, thereby reducing lighting energy consumption by 54%. ▪ In the new head offices in Gdańsk and Wrocław, LED lighting was used in the DALI system with motion sensors and light intensity sensors taking into account the supply of daylight. Improving the quality of lighting in offices has had a tremendous impact on employee health, well-being and productivity. ▪ In 2023, a smart LED lighting system was installed in the garage of the Head Offices in Warsaw.
<p>Reduction of the operating time of technical equipment</p>	<ul style="list-style-type: none"> ▪ In 2023, the optimization of the operating time of the installations in the buildings progressed. To this effect, the settings and technical parameters of various devices, for example, operating time of office lighting, operating time of ventilation and air conditioning and temperature settings in individual areas, were changed. These optimizations have helped minimize electricity consumption at the Bank's Head Offices.
<p>Energy savings in branches</p>	<ul style="list-style-type: none"> ▪ Advertising banners with traditional light sources were replaced with energy-efficient LEDs in all branches. ▪ Time control of advertising banner lighting using astronomical clocks.

Action	Description
Rational management of energy consumption	<ul style="list-style-type: none"> ▪ We have consistently increased the number of branches with LED lighting. At the end of 2023, 186 branches used LED lighting. LED lighting is standard in all modernized Corporate Centers. ▪ All facilities have restricted air conditioning operation by installing timers to regulate the running time of air conditioning units. ▪ In the Bank's Head Offices, the air conditioning is set at 21 degrees Celsius and ceases to operate after working hours; ▪ During visits of Experts in the Bank's branches, a campaign promoting conscious use of air conditioning in the context of electricity consumption and environmental protection is conducted. ▪ Virtualization of servers has made it possible to reduce the number of physical hardware in the computer center, which drove down energy consumption for power supply and air conditioning; ▪ In 2023, additional floors at the Bank's Head Office in Warsaw were redeveloped. Occupancy sensors were installed in all toilets and small kitchens - the lights turn off automatically if there are no people present. In new and modernized office spaces, a modern lighting system with occupancy sensors and light intensity sensors was installed in the open space sections, using daylight supply. The system is designed to significantly reduce utility consumption compared to old-style lighting.
Utility consumption control	<ul style="list-style-type: none"> ▪ It is done on an ongoing basis. Based on the financial data, a consumption ranking of energy recipients is prepared. Branches with the highest energy consumption rates are controlled and recommendations for building administrator companies are implemented. Similarly, in the event of high utility bills it is verified whether the consumption is correct and whether or not any devices or installations have broken down. In 2023, the additional education campaign for network employees regarding social spaces was continued - in all locations that have not yet been equipped with light and climate sensors. The campaign encouraged employees to consume electricity rationally.
Optimization of water consumption (branches and head office)	<ul style="list-style-type: none"> ▪ In its own buildings, the Bank installed 173 state-of-the-art perlator taps, special tap attachments that visually increase the flow of water through aeration. Perlator taps save from 15% to 25% of water. ▪ Hot and cold water dispensers are installed in the Head Offices, which encourages office workers to use dispensers instead of buying bottled water. This has the effect of reducing waste - including plastic.

Action	Description
Infrastructure supporting ESG objectives	<ul style="list-style-type: none"> <li data-bbox="496 360 1366 521">▪ (Showers, chargers, bicycle parking, green areas - Gdańsk and Warsaw) In order to promote measures reducing CO2 emissions, the Bank encourages employees to ride bicycles instead of using public transport and cars. In each location of the Bank’s Head Office, the Bank has built parking spots for cyclists and sanitary facilities. <li data-bbox="496 546 1366 667">▪ By installing a parcel machine at the Warsaw Head Office, the Bank promotes the reduction of CO2 emissions, because employees no longer have to drive to get parcels. A single parcel machine reduces CO2 emissions by almost 14,000 kg.

[GRI 302-4] Energy savings in the Bank's locations	2023	2022***	2021	2020
RETAIL OUTLETS (excluding Millennium Mini outlets)				
Branches with LED lighting banners	350	381	417	456
	100%	100%	100%	100%
Energy-saving light sources in branches (LED lighting)	186	169	153	117
	53.1%	44.3%	36.5%	26%
CORPORATE BANKING OUTLETS*				
Branches with LED lighting banners	6	5	8	7
	100%	100%	100%	100%
Energy-saving light sources in locations (LED lighting)	4	4	4	1
	67%	80%	50%	14%
BANK MILLENNIUM'S HEAD OFFICES**				
Branches with LED lighting banners	3	3	3	3
	100%	100%	100%	100%
Energy-saving light sources in locations (LED lighting)	3	3	2	1
	100%	100%	66%	33%

* Corporate banking outlets, excluding locations at the same address as the Head Offices or retail outlets.

** Bank Millennium Head Offices understood in terms of city location rather than individual buildings due to dispersed structure.

*** Starting in Q3 2022, the new rules for turning advertisements on were introduced. The banners are turned on at 3:30 p.m. and turned off when the outlet is closed.

Fuels

Action	Description
Hybrid vehicles	Gasoline combustion cars in the Bank’s fleet have been replaced with new hybrid vehicles, which translated into even greater reductions in exhaust emissions into the environment.
Limiting the amount of business travel	In order to minimize business travel, limits are used for respective types of transportation (and the low-carbon railway is recommended, as shown by the increased number of railway kilometers traveled) and remote communication methods are used, such as: e-learning courses, teleconferencing and videoconferencing.

2.2.2. GREENHOUSE GAS EMISSIONS

The bank has been monitoring and publishing data on carbon dioxide emissions for over a decade. In the current business strategy, the Bank declared a reduction of greenhouse gas emissions in 2022 by 50% in scope 1 and 2 compared to 2020 (in a market-based approach), as well as striving to achieve climate neutrality by 2027 in scope 1 and 2, and by 2050 in scope 3. The choice of the base year (2020) results from the Bank Millennium Group Strategy for 2022-2024. In 2023, Bank Millennium reduced greenhouse gas emissions in scope 1 and 2 by 69.2% compared to the base year, and the Bank Millennium Group by 70.6%. Information on the emission volume in 2023 (compared to 2020 and 2022) and information on the calculation methodology are presented below.

Carbon footprint [GRI 305-1, 305-2, 305-3, 305-4]

Scope 1, 2 and 3 GHG emissions in tonnes CO₂e for Bank Millennium

Scope of GHG emissions	Emission category	Emissions [tonnes CO ₂ e]			Percentage change	
		2023	2022	2020	2023/2022	2023/2020
Scope 1	Combustion in mobile sources	1,772	1,803	1,840	-1.7%	-3.7%
	including:					
	• LPG	38	177	204	-78.5%	-81.4%
	• Diesel	39	270	703	-85.6%	-94.5%
	• Petrol	1,695	1,356	933	+25.0%	+81.7%
	Combustion in stationary sources	316	363	405	-12.9%	-22.0%
	including:					
	• Natural gas	294	333	388	-11.7%	-24.2%
	• Heating oil	22	30	17	-26.7%	+29.4%
Fugitive emissions**	30	–	–	+100.0%	–	
Total: Scope 1		2,118	2,166	2,245	-2.2%	-5.7%
Scope 2	Purchase of heat	5,168	7,769	9,917	-33.5%	-47.9%
	Purchase of electricity (location-based)	11,375	14,224	16,820	-20.0%	-32.4%
	Purchase of electricity (market-based)	0	0	11,517	0.0%	-100.0%
Total: Scope 2 (location-based)		16,543	21,993	26,737	-24.8%	-38.1%
Total: Scope 2 (market-based)		5,168	7,769	21,434	-33.5%	-75.9%
	Cat. 1 Purchased goods and services*	749	746	–	+0.4%	–

	Cat. 2 Capital goods*	387	424	–	-8.7%	–
	Cat. 3 Fuel- and Energy-Related Activities not included in Scope 1 or Scope 2 (location-based)	3,436	4,209	3,120	-18.4%	+10.1%
Scope 3	Cat. 3 Energy and fuel-related emissions (not included in scope 1 and 2) (market-based)	781	768	3,120	+1.7%	-75.0%
	Cat. 5 Waste generated in operations*	51	48	–	+6.3%	–
	Cat. 6 Business travel	200	161	127	+24.2%	+57.5%
Total: Scope 3 (location-based)		3,635	4,370	3,247	-16.8%	+11.9%
Total: Scope 3 (market-based)		981	929	3,247	+5.6%	-69.8%
Total: Scope 3 (location-based)*		4,822	5,588	–	-13.7%	–
Total: Scope 3 (market-based)*		2,167	2,147	–	+0.9%	–
Total: Scope 1, 2, 3 (location-based)		22,297	28,528	32,230	-21.8%	-30.8%
Total: Scope 1, 2, 3 (market-based)		8,267	10,864	26,927	-23.9%	-69.3%
Total: Scope 1, 2, 3* (location-based)		23,483	29,746	–	-21.1%	–
Total: Scope 1, 2, 3* (market-based)		9,454	12,082	–	-21.8%	–

* Categories included in emission calculations since 2022 (additionally in scope 3: cat. 1, 2, 5). Data without * is data for which a report was prepared in the base year (2020): scope 1 and 2 and categories 3 and 6 of scope 3.

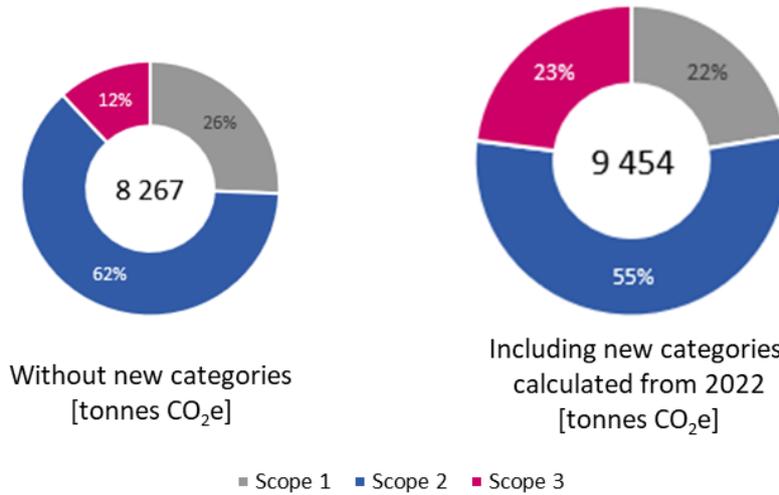
** In 2023 fugitive emissions from refrigerant leaks were calculated for the first time.

The volume of total GHG emissions (market-based) generated by Bank Millennium in 2023 amounted to 9,454 tons of CO₂e, with the extension of the scope of calculations for scope 3 compared to the base year to include new categories: purchased products and services, capital goods and waste generated during activities. These categories were selected based on materiality analysis taking into account data availability criterion and are counted from 2022. With the scope of calculations the same as in the base year 2020, emissions for 2023 amounted to 8,267 tons of CO₂e (market-based) and were 69.3% lower than in 2020.

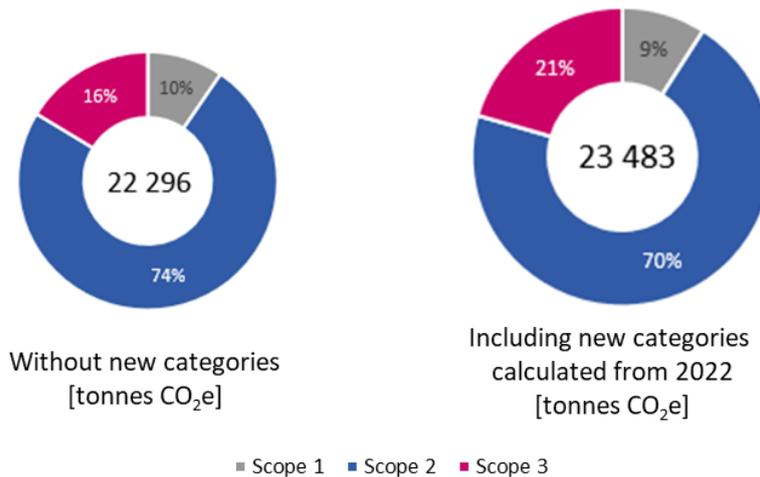
In 2023, direct emissions generated by Bank Millennium in scope 1 amounted to 2,118 tons of CO₂e, of which 83.7% came from combustion in mobile sources, 14.9% from combustion in stationary sources, and 1.4% was related to leakage of refrigerants. In 2023, indirect emissions in scope 2 (location-based)

amounted to 16,543 tons of CO₂e, of which 68.8% were related to the consumption of purchased electricity and 31.2% of purchased heat energy. In 2023, indirect emissions in scope 2 (market-based) for electricity amounted to 0 tons of CO₂e due to the fact that Guarantees of Origin covering consumption of 16,605 MWh were purchased. 5,168 tons of CO₂e were emitted due to consumption of purchased thermal energy.

Bank Millenium's carbon footprint in 2023 (market-based)



Bank Millenium's carbon footprint in 2023 (location-based)



In 2023, emissions related to production of purchased products and services, capital goods and the management of waste generated as part of activities were calculated, taking into account the same scope as in 2022. In 2023, the share of indirect emissions in scope 3 (market-based) was 22.9% of the total calculated emissions, and in the location-based approach this share was 20.5%.

Purchased products and services included emissions related to plastic payment cards and office supplies, and emissions from them amounted to 34.6% of emissions from scope 3 (market-based)

method). The capital goods category includes IT equipment (i.e. laptops, printers, desktop computers, mobile phones). GHG emissions in this category amounted to 17.9% of emissions from scope 3 (market-based method). Emissions related to energy and fuels (not included in scope 1 and 2), also including indirect emissions related to the photovoltaic installation owned by Bank Millennium, accounted for 36.0%, and business trips accounted for 9.2% of emissions from scope 3 (market-based method). The waste generated as part of the activities includes paper and cardboard waste, used IT equipment, metals, batteries, plastic, and GHG emissions related to their management amounted to 2.3% of emissions from scope 3 (market-based method).

Carbon footprint [GRI 305-1, 305-2, 305-3, 305-4]

Scope 1, 2 and 3 GHG emissions in tonnes CO₂e for Bank Millennium Group

Scope of GHG emissions	Emission category	Emissions [tonnes CO ₂ e]			Percentage change	
		2023	2022	2020	2023/2022	2023/2020
Scope 1	Combustion in mobile sources	1,991	2,051	2,130	-2.9%	-6.5%
	including:					
	• LPG	38	177	204	-78.5%	-81.4%
	• Diesel	40	317	731	-87.4%	-94.5%
	• Petrol	1,913	1,557	1,195	+22.9%	+60.1%
	Combustion in stationary sources	346	390	471	-11.3%	-26.5%
	including:					
	• Natural gas	317	351	450	-9.7%	-29.6%
• Heating oil	29	39	21	-25.6%	+38.1%	
	Fugitive emissions**	29	–	–	100.0%	–
Total: Scope 1		2,366	2,441	2,601	-3.1%	-9.0%
Scope 2	Purchase of heat	5,519	8,180	11,191	-32.5%	-50.7%
	Purchase of electricity (location-based)	12,373	15,755	19,096	-21.5%	-35.2%
	Purchase of electricity (market-based)	0	0	12,985	0.0%	-100.0%
Total: Scope 2 (location-based)		17,892	23,936	30,287	-25.3%	-40.9%
Total: Scope 2 (market-based)		5,519	8,180	24,176	-32.5%	-77.2%
	Cat. 1 Purchased goods and services*	757	962	–	-21.3%	–
	Cat. 2 Capital goods*	387	450	–	-14.0%	–

	Cat. 3 Fuel- and Energy-Related Activities not included in Scope 1 or Scope 2 (location-based)	3,755	4,676	3,565	-19.7%	+5.3%
Scope 3	Cat. 3 Energy and fuel-related emissions (not included in scope 1 and 2) (market-based)	868	865	3,565	+0.3%	-75.7%
	Cat. 5 Waste generated in operations*	52	48	–	+8.3%	–
	Cat. 6 Business travel	200	161	127	+24.2%	+57.5%
Total: Scope 3 (location-based)		3,955	4,837	3,691	-18.2%	+7.2%
Total: Scope 3 (market-based)		1,067	1,026	3,691	+4.0%	-71.1%
Total: Scope 3 (location-based)*		5,151	6,297	–	-18.2%	–
Total: Scope 3 (market-based)*		2,263	2,486	–	-9.0%	–
Total: Scope 1, 2, 3 (location-based)		24,213	31,214	36,580	-22.4%	-33.8%
Total: Scope 1, 2, 3 (market-based)		8,953	11,647	30,469	-23.1%	-70.6%
Total: Scope 1, 2, 3* (location-based)		25,409	32,674	–	-22.2%	–
Total: Scope 1, 2, 3* (market-based)		10,149	13,107	–	-22.6%	–

* Categories included in emission calculations since 2022 (additionally in scope 3: cat. 1, 2, 5). Data without * is data for which the report was prepared in the base year (2020): scope 1 and 2 and categories 3 and 6 of scope 3.

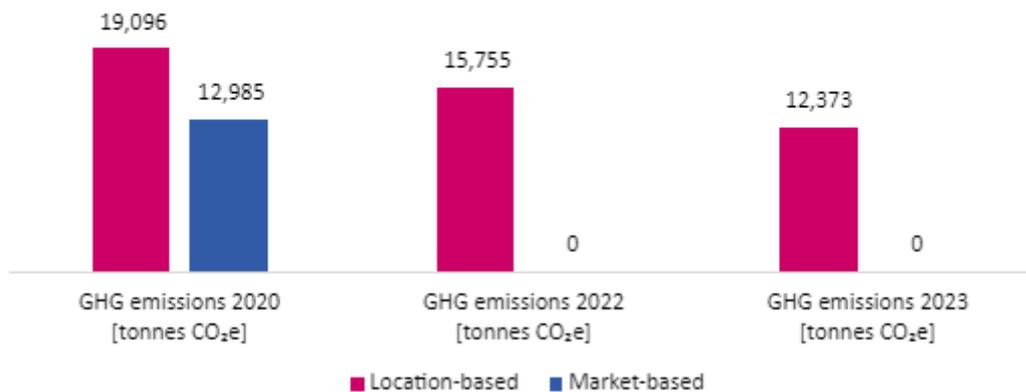
** In 2023, fugitive emissions from refrigerant leaks were calculated for the first time.

The volume of total GHG emissions (market-based) generated by the Bank Millennium Group in 2023 amounted to 10,149 tons of CO₂e. Indirect emissions from scope 2 (market-based) accounted for 54.4% of the total emissions of the Bank Millennium Group, of which 100% of emissions from this scope was emitted through consumption of purchased thermal energy. In 2023, direct emissions from scope 1 accounted for approximately 23.3% of the total emissions of the Bank Millennium Group (market-based), of which 84.1% came from combustion in mobile sources, 14.6% from combustion in stationary sources, and 1.3% were related to leakage of refrigerants. In 2023, 70.4% of the total calculated emissions of the Bank Millennium Group came from indirect emissions from scope 2 (location-based), while 69.2% of emissions from this scope were emitted in connection with the consumption of purchased electricity, and 30.8 % came from the consumption of purchased thermal energy.

In 2023, emissions related to production of purchased products and services, capital goods and the management of waste generated as part of activities were calculated, taking into account the same scope as in 2022. In 2023, the share of indirect emissions in scope 3 (market-based) for the Bank Millennium Group was 22.3% of the total calculated emissions, and in the location-based approach this share was 20.3%.

The purchased products and services included emissions related to plastic payment cards and office supplies, and emissions from them amounted to 33.5% of emissions from scope 3 (market-based method). The capital goods category includes IT equipment (i.e. laptops, printers, desktop computers, mobile phones). GHG emissions in this category amounted to 17.1% of emissions from scope 3 (market-based method). Emissions related to energy and fuels (not included in scope 1 and 2) accounted for 38.3%, and business travel 8.8% of emissions in scope 3 (market-based method). The waste generated as part of the activities includes paper and cardboard waste, used IT equipment, metals, batteries, plastic, and GHG emissions related to their management amounted to 2.3% of emissions from scope 3 (market-based method).

Emissions related to the purchase of electricity for Bank Millennium Group location-based vs. market-based



[GRI 305-5] Due to purchase of Guarantees of Origin of Energy in the amount of 18,063 MWh for electricity purchased directly by the Bank, emissions related to the purchase of electricity in Bank Millennium were reduced by 100% [11,375 tons of CO₂e] and in the Bank Millennium Group also by 100% [12,373 tons of CO₂e] comparing calculations according to the location-based method (where the average indicator for Poland is used) to the market-based method (where the energy seller is known, the seller-specific emission factor is used).

Scope 1, 2 and 3 GHG emissions in tonnes CO₂e per mPLN of operating income for the Bank Millennium

Scope of GHG emissions	Emission volume/mPLN of operating income [tonnes CO ₂ e/mPLN]			Percentage change	
	2023	2022	2020	2023/2022	2023/2020
Scope 1, 2 (market-based)	1.12	2.57	6.92	-56.4%	-83.8%
Scope 1, 2, 3 (market-based)	1.27	2.81	7.87	-54.8%	-83.9%
Scope 1, 2, 3* (market-based)	1.45	3.13	–	-53.7%	–

* Categories included in emission calculations for 2022 (additionally in scope 3: cat. 1, 2, 5). Data without * is data for which the report was prepared in the base year (2020): scope 1 and 2 and categories 3 and 6 of scope 3.

Scope 1, 2 and 3 GHG emissions in tonnes CO₂e per employee for Bank Millennium

Scope of GHG emissions	Emissions volume/employee [Mg CO ₂ e/employee]			Percentage change	
	2023	2022	2020	2023/2022	2023/2020
Scope 1, 2 (market-based)	1.12	1.51	3.31	-25.8%	-66.2%
Scope 1, 2, 3 (market-based)	1.27	1.65	3.76	-23.0%	-66.2%
Scope 1, 2, 3* (market-based)	1.46	1.83	–	-20.2%	–

* Categories included in emission calculations for 2022 (additionally in scope 3: cat. 1, 2, 5). Data without * is data for which the report was prepared in the base year (2020): scope 1 and 2 and categories 3 and 6 of scope 3.

Scope 1, 2 and 3 GHG emissions in tonnes CO₂e per mPLN of operating income for the Bank Millennium Group

Scope of GHG emissions	Emission volume/mPLN of operating income [tonnes CO ₂ e/mPLN]			Percentage change	
	2023	2022	2020	2023/2022	2023/2020
Scope 1, 2 (market-based)	1.17	2.65	7.48	-55.7%	-84,4%
Scope 1, 2, 3 (market-based)	1.33	2.91	8.52	-54.2%	-84.4%
Scope 1, 2, 3* (market-based)	1.51	3.27	–	-53.8%	–

* Categories included in emission calculations for 2022 (additionally in scope 3: cat. 1, 2, 5).
 Data without * is data for which the report was prepared in the base year (2020): scope 1 and 2 and categories 3 and 6 of scope 3.

Scope 1, 2 and 3 GHG emissions in tonnes CO₂e per employee for Bank Millennium Group

Scope of GHG emissions	Emissions volume/employee [Mg CO ₂ e/employee]			Percentage change	
	2023	2022	2020	2023/2022	2023/2020
Scope 1, 2 (market-based)	1.15	1.42	3.57	-19.0%	-67.8%
Scope 1, 2, 3 (market-based)	1.30	1.55	4.07	-16.1%	-68.1%
Scope 1, 2, 3* (market-based)	1.48	1.88	–	-21.3%	–

* Categories included in emission calculations for 2022 (additionally in scope 3: cat. 1, 2, 5).
 Data without * is data for which the report was prepared in the base year (2020): scope 1 and 2 and categories 3 and 6 of scope 3.

Calculation methodology used

Greenhouse gas emission calculations were prepared in accordance with the Greenhouse Gas Protocol (GHG Protocol), according to the revised version: 'A Corporate Accounting and Reporting Standard revised edition, GHG Protocol Scope 2 Guidance Amendment to the GHG Protocol Corporate Standard' and 'Corporate Value Chain (Scope 3) Accounting and Reporting Standard, Supplement to the GHG Protocol Corporate Accounting and Reporting Standard'.

The calculations include all companies from the Millennium Group. Calculations in scopes 1 and 3 were made taking into account all greenhouse gases, in scope 2 the Kobize and URE indicators relating only to carbon dioxide CO₂ were used. In scopes 1 and 2, all identified emission sources were taken into account. In scope 3, calculations were made for purchased products (category 1), capital goods (category 2), energy and fuels (upstream stages, category 3) and waste (category 5) and business trips (category 6). Category 1 of scope 3 includes only plastic payment cards and office supplies, services are excluded. In category 2, only IT equipment was taken into account. Categories 3, 5 and 6 include all identified emission sources.

GHG emissions were calculated separately for Bank Millennium (BM) and the Bank Millennium Group (GBM), which includes the following companies: Millennium Consulting S.A.; Millennium TFI S.A. (a subsidiary of Millennium Consulting S.A.); Millennium Leasing sp. z o. o.; Millennium Bank Hipoteczny S.A.; Millennium Goodie sp. z o. o.; Millennium Service sp. z o. o.; Millennium Telecommunication Services sp. z o. o. (including 2% affiliated entity Millennium Leasing S.A.) and companies that do not generate emissions - Piast Expert sp. z o.o. in liquidation, Lubuskie Fabryki Mebli S.A. in liquidation. In February 2023, the Bank sold 80% of shares in Millennium Financial Services sp z o.o. Life Insurance Company Europa S.A. and Towarzystwo Ubezpieczeń Europa S.A. After selling 80% of the shares, the Bank holds 20% of shares of a company currently operating under the name Europa Millennium Financial Services sp. z o.o. Operational control was adopted as the criterion to determine the organizational boundaries. Bank Millennium has 100% operational control in the mentioned companies generating GHG emissions, apart from Europa Millennium Financial Services sp. z o. o. Based on information obtained from the Millennium Bank Group, it was assumed that the share in the consumption of materials and utilities being the basis for emission calculations for Millennium Financial Services sp z o.o. is immaterial.

The scope of emissions reporting according to the GHG Protocol includes:

- direct emissions from scope 1 from the combustion of fuels in own or controlled energy sources: combustion in stationary sources - heating boilers for natural gas and fuel oil, uncontrolled emissions (refrigerants) and combustion in mobile sources - vehicles used by companies (LPG, petrol, diesel),
- scope 2 indirect emissions from the production of purchased electricity and heat energy,
- other indirect emissions from scope 3, originating from purchased products and services and related to energy and fuels (not included in scope 1 and 2), as well as emissions from waste generated in the course of activities and generated during business trips in means of transport that are not owned or controlled by the company (such as planes, trains and taxis).

Carbon footprint calculations were performed in accordance with the methodology used in previous years, taking into account updated indicators. Energy calculations were carried out using two required methodological approaches, i.e. location-based (using the average emission factor for Poland) and market-based (using emission factors specific to energy sellers). For scopes 1, 2 and five categories of scope 3, in 2023 the total CO₂e emissions (market-based) for Bank Millennium amounted to 9,454.10 t CO₂e, including 9,439.61 t CO₂, 7.41 t CH₄ and 7.08 t N₂O, and for the Bank Millennium Group 10,148.64 t CO₂e, including 10,132.63 t CO₂, 8.30 t CH₄ and 7.71 t N₂O. For scopes 1, 2 and five

categories of scope 3, in 2023 the total CO₂e (location-based) emissions for Bank Millennium amounted to 23,483.42 t CO₂e, including 23,468.93 t CO₂, 7.41 t CH₄ and 7.08 t N₂O, and for the Bank Millennium Group 25,409.49 t CO₂e, including 25,393.47 t CO₂, 8.30 t CH₄ and 7.71 t N₂O. For data from 2023, biogenic emissions related to the addition of biofuel to diesel and petrol were calculated. These are “outside of scopes” emissions which amounted to 99.16 t CO₂e for Bank Millennium and 111.63 t CO₂e for the Bank Millennium Group.

In order to maintain consistency, the calculations were compared with the year 2022. Last year's calculations included scope 1 and 2 and the same scope 3 categories (1, 2, 3, 5, 6) as in the current year. As in the previous year, purchased IT services and accessories were not included due to lack of specific indicators.

Data used for calculations and measurements of 2023 emissions

Fuel and energy consumption is presented in the tables regarding the GRI 302-1 indicator.

Data used for calculation and measurement of emissions for scope 1

Combustion in mobile sources:

Diesel oil, petrol, LPG - data on fuel consumption (in liters) comes from a summary prepared by Bank Millennium and applies to the Bank and the Group. Fuel consumption data comes from a summary of fuel card reports. Fuel consumption in Millennium Bank Hipoteczny S.A. was estimated based on the cost of fuels.

Combustion in stationary sources:

Natural gas - data on gas consumption (in m³) in Bank Millennium and the Bank Millennium Group were provided by the Bank, based on invoices in the FK (financial) system and their scans, reading consumption, and for those invoices for which scans do not exist in the system, calculation of consumption based on known costs and the average price of natural gas known on the basis of invoices for which the scans were read. Data on gas consumption in Bank Millennium and the Bank Millennium Group were estimated based on costs.

Heating oil - data on consumption (in liters) in Bank Millennium and the Bank Millennium Group were provided by the Bank, based on invoices in the FK (financial) system and their scans, reading consumption, and for those invoices for which scans do not exist in the system, calculation of consumption based on known costs and the average price of heating oil known on the basis of invoices for which the scans were read.

Fugitive emissions:

Refrigerants - data (in kg) comes from a list prepared by the Bank, including 15 branches. This list includes two refrigerants - R32 and R410A (also written incorrectly in the source data as R410).

Data used for calculation and measurement of emissions for scope 2

Purchased energy:

Electricity - data on electricity consumption (in kWh) in Bank Millennium and the Bank Millennium Group was provided by the Bank. Calculations of the value of annual electricity consumption are based on cost and quantitative data (expressed in physical units).

Bank Millennium has a photovoltaic system. The energy obtained from photovoltaic panels is used on site for own needs, which results in lower demand for purchased electricity. Electricity obtained from PV installations does not generate GHG emissions in scope 2.

Heat (district) - data on consumption (in GJ) in Bank Millennium and the Bank Millennium Group was provided by the Bank. Calculations of the value of annual heat consumption are based on cost and quantitative data (expressed in physical units).

Data used for calculation and measurement of emissions for scope 3

The units of the supplied data are given in brackets.

Purchased products and services:

Payment cards (pcs.) - quantitative data received from suppliers was used to calculate emissions resulting from the purchase of payment cards. The number of cards issued and cards destroyed was taken into account.

Office supplies (kg) - calculations were carried out for purchased materials specified in mass units: printed paper, envelopes, paper and paper rolls for operational needs, cardboard boxes, plastic materials (stretch foils, checkout bags, etc., packaging for disinfectants) and batteries.

Water (kg, m³) - included water purchased in plastic packaging and drinking water from the water supply network.

Capital goods

IT equipment (pcs.) - emissions were calculated on the basis of quantitative data from invoices regarding the purchase of individual types of IT equipment: computers, printers, laptops, telephones and tablets.

Waste generated by activities (kg):

The activities generate sewage (municipal) and waste. Waste is sent for reuse and recycling (paper, cardboard, metal, plastics, IT equipment divided into neutral and hazardous waste) and municipal waste, from which the following fractions are separated: mixed waste, paper, metal and plastics, bio-waste, glass.

Business travels (km):

Air travel - emissions were calculated based on reports relating to the number of kilometers travelled received from a travel agency that sells airline tickets.

Railway transport - data on the distance travelled was calculated on the basis of reports relating to the number of kilometers received from a travel agency that acts as an intermediary in the sale of some railway tickets and on the basis of the costs incurred.

Road transport (bus, taxi, private cars) - for Bank Millennium, data on the distance travelled were estimated based on realized costs. The distance travelled by private cars was calculated on the basis of costs, including a lump sum per kilometer (so-called mileage). Bank Millennium does not have tools to record kilometers travelled during business trips

Emission factors 2023

Scope 1 emission factors:

Fuels (combustion in mobile and stationary sources) - DEFRA 2023, version 1.1 (published on June 7, 2023, updated on June 28, 2023).

Fugitive emissions - DEFRA 2023, version 1.1 (published June 7, 2023, updated June 28, 2023) and from online sources.

Scope 2 emission factors:

Location-based electricity - emission indicators for electricity for 2022 published in December 2023 (indicator for data for 2023).

Market-based electricity

Due to the fact that Guarantees of Origin for electricity purchased directly by the Bank were purchased in the amount of 16,605.30 MWh for the Bank and 18,062.95 MWh for the Bank Millennium Group, emissions related to the purchase of electricity were reduced in Bank Millennium by 100% [11,374.63 t CO₂e] and Bank Millennium Group by 100% [12,373.12 t CO₂e].

Heat - URE (Energy Regulatory Office); Report "Thermal energy in numbers - 2022" - the latest available document used in emission calculations.

Scope 3 emission factors:

Category 1: Ecoinvent 3.9.1, Exiobase, DEFRA 2023, version 1.1, data from online sources.

Category 2: Ecoinvent 3.9.1, data from online sources.

Category 3: DEFRA 2023, version 1.1. and 2023 Government Greenhouse Gas Conversion Factors for Company Reporting Methodology Paper for Conversion Factors. Final Report.

Category 5: DEFRA 2023, version 1.1.

Category 6: DEFRA 2023, version 1.1.

The emission data presented in the "Greenhouse gas emissions" chapter was calculated by independent third-party companies.

2.2.3. ENVIRONMENTALLY-FRIENDLY PRODUCTS AND RESPONSIBLE FINANCING

Bank Millennium Group provides financing for various pro-environmental activities of its clients. Active measures are also taken to reduce the use of paper in communication with our clients in all lines of business. Clients may confirm some of the transactions ordered in branches using Mobile Authorization, which has significantly reduced the quantity of paper used for document print-outs.

Individual customers

Millennium TFI funds

One of the measures implemented as part of the Bank Millennium Group's strategy is the integration of ESG factors in asset selection processes in investment portfolios. Given the rapidly growing trend of European and global investors using sustainability criteria in investment decision-making and taking into account the bank's business strategy, Millennium TFI's product offering was modified. Millennium TFI transformed three Subfunds separated within the Millennium Specialized Open-End Investment Fund in accordance with the requirements of Article 8 of the SFDR¹. They promote environmental, social and corporate governance aspects (as so-called light green products) by including them in the investment selection criteria and by applying certain investment restrictions. Customers who want to support sustainability with their investment decisions can now find the suitable products in the Millennium TFI range.

The Subfunds that satisfy the ESG criteria are available both in Bank Millennium outlets and, out of concern for the natural environment, through electronic channels, i.e. the Milenet online banking system and the Bank's mobile application. Clients may choose from among three Subfunds designed as funds of funds:

- Plan Spokojny Subfund - which invests mainly in global debt instruments.
- Plan Wyważony Subfund - which balances investments in global debt and equity instruments.
- Plan Aktywny Subfund - which invests mainly in global equity instruments.

In the above Subfunds offer, sustainability (ESG) issues are assessed as a risk to investment value. The issuers whose strategy is built on good ESG practices may be approached as entities with a lower level of investment risk and therefore higher investment appeal. Investment risk is assessed within an internal ESG Risk Rating system and takes into account ESG ratings published by independent agencies and analysts, issuer reports regarding the ESG principles observed, the type of industry in which the issuer operates and other public information that may serve a source for the ESG assessment of the issuer.

Each of the above mentioned Subfunds invests at least 50% of assets in other "green" investment funds that meet the criteria of the SFDR. Additional limits have also been introduced to limit the share of funds (instruments) with poor ESG ratings or that are unrated, as well as restrictions for issuers that fail to follow good practices.

WWF Millennium MasterCard Credit Card

Bank Millennium has been cooperating with WWF Polska since 2008. WWF is an independent environmental organization supported by more than 35 million people, with a global network active in nearly 100 countries. WWF's mission is to stop the environmental degradation of our planet and

¹Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector (Sustainable Finance Disclosure Regulation)

shape a future where people live in harmony with nature by protecting the world's biodiversity, sustainably using renewable resources, and reducing pollution and waste.

The Bank and WWF's joint initiatives aim to promote nature and climate conservation action. Beginning in 2022, activities revolve around the slogan "Forest - home for animals, breath for people and protection of climate." On International Earth Day, in April 2023, Bank Millennium launched a new card WWF Millennium Mastercard. The card features a new image of a lynx - the largest representative of the cat family in Europe, which is under strict species protection in Poland. For each main card issued, the Bank donates PLN 50 to WWF Poland. The Bank also provides additional funds to support the organization's statutory activities.

Thanks to its virtual form, the **goodie eCard** is a convenient and environmentally-friendly way of giving a gift. The card can be set up in just a few moments in the goodie mobile app. In addition, the goodie app affords access to the electronic versions of the store flyers of many shopping networks thereby reducing paper consumption.

Offer for businesses

The strategic objective of the Bank Millennium Group, as set forth in the 2022-24 Strategy, includes active support for decarbonization efforts of the Bank's clients and granting PLN 2 billion of financing for sustainable and transformational projects for the clients of the Bank and the Bank's Group over the next 3 years.

At the same time, the Bank Millennium Group does not finance new coal mines and coal-fired power generation projects, except for new projects related to reduction of pollution. These issues are described in detail in the section entitled "Environmental Policy of the Bank Millennium Group".

Lending activity

In 2023, we made a loan available for the construction of a photovoltaic installation or power plant. With our product, we support environmentally friendly solutions, energy transition and, at the same time, respond to rising electricity prices. The product is available in two options:

- **Photovoltaic loan - self-consumption**, with which we can finance 100% of the net construction costs of micro and small photovoltaic installations with a capacity of up to 1 MWp, designed to produce renewable energy entirely for the company's own needs. The loan amount is a maximum of PLN 2 million.
- **Photovoltaic loan - mix**, with which we can finance 80% of the total net construction costs of a photovoltaic installation with renewable energy production for sale and own consumption, with a minimum of 50% self-consumption. The investment may also involve purchase and installation of energy storage up to and including 10 MW. The maximum loan amount in this option is PLN 20 million.

As of the end of March, companies could apply to the bank for a **Technological Loan**, which offers funding in the form of a non-refundable technology bonus provided by Bank Gospodarstwa Krajowego. The Technological Loan is a continuation of the competition known in the past as the Technological Innovation Loan. It allows companies to obtain funding of up to 70% of the eligible costs of an investment project involving the implementation of a new technology, understood as any significant and beneficial change in the process, which was not previously used in the business, and which, at the same time, improves the characteristics of the manufactured product or provided service. The deadline for applications ended on 31 May 2023.

For customers seeking financing for green investment projects we have made available an **Environmental Loan**. It can be used for investments in energy efficiency, energy savings, including thermal upgrading of buildings, changing the sources of energy used to more environmentally friendly ones, and replacing equipment, installations or process lines with more energy-efficient ones.

The Environmental Loan is a competition funded by the European Funds for a Modern Economy (FENG) Operational Program. Support under the competition is offered to businesses from the sector of micro, small and medium-sized enterprise sector (with up to 250 employees) and businesses from the category of small mid-cap companies (with up to 499 employees) and mid-cap companies (with up to 3,000 employees).

The Environmental Loan is a new form of financing green projects, with support for companies in the form of a non-refundable green bonus covering up to 80% of eligible investment costs. Applications for support are accepted by Bank Gospodarstwa Krajowego (BGK). Submission of an application to BGK is conditional on obtaining a loan commitment letter. Bank Millennium is one of the lending banks issuing the commitment letters required to obtain the funding. The call for applications in this round ended on 17 August this year. In 2024, two calls for applications are scheduled for the Environmental Loan competition.

Millennium Leasing is consistently involved in the financing of energy savings investment projects in compliance with the Environmental Policy of the Bank Millennium Group and industrial policy. Millennium Leasing advocates the financing of equipment to generate energy from renewable sources. Since 2019 Millennium Leasing is particularly active in developing the **MilleSun** program designed to finance PV investments. Leasing panels is a solution targeting commercial undertakings poised to reduce the costs of energy consumption and to modify social awareness when it comes to environmental protection and keen on building their environmentally-friendly image and ensuring economic efficiency of their investments.. In the leasing of PV panels Millennium Leasing cooperates with leading reliable suppliers of these types of installations; it offers safe financing on preferential terms and conditions and a greatly simplified process to lease environmentally-friendly investment projects. In 2022, Millennium Leasing launched the financing for heat pumps in the MilleSun Program, and in 2023 - for energy storage facilities.

In 2023 Millennium Leasing continued to implement the *Mój Elektryk* program, which guarantees customers subsidized lease payments for zero-emission vehicles. The purpose of the program is to reduce air pollution emissions by reducing the consumption of fuel generating emissions in transport. It constitutes support and an incentive to opt for zero emission vehicles. Millennium Leasing has participated in the program since 2022. The subsidies are up to PLN 4,000 for motorcycles, scooters and quads, up to PLN 27,000 for passenger cars (for transporting up to 8 people), and up to PLN 70,000 for delivery vehicles up to 3.5t.

In 2023 the Company launched a pilot Preferential Program for financing environmentally friendly assets, which it plans to roll out in full in 2024.

The economy's transition and clients' implementation of sustainable development policies will in the future be a growing source of demand for the financing offered by Millennium Leasing. We anticipate that this growth will pertain in particular to the following:

- investments in energy saving machines and equipment to reduce the quantity and the cost of electricity used per product unit,
- low emission means of transport supporting the reduction of CO2 emissions in the transportation of people and cargo,
- technologies for generating and storing energy from renewable sources.

2.4. FULFILLING THE REPORTING REQUIREMENTS

The Bank Millennium Group has been reporting information on its environmental impact since 2011, including data regarding the emission of greenhouse gases under Scope 1 and Scope 2 and partially under Scope 3, gradually increasing the scope of reported data. The knowledge on this topic is expanded by implementing projects with consulting companies, participating in conferences and expert workshops (organized e.g. by the Polish Association of Listed Companies) and in the work done by the Polish Bank Association. In 2023, further work was carried out to prepare the Group to reporting on sustainability topics in relation to various aspects of reporting required by law and market standards (including the Corporate Sustainability Reporting Directive (CSRD) and European Sustainability Reporting Standards (ESRS)).

Bank Millennium is a member of the Sustainable Financing Committee of the Polish Bank Association and also takes part in the work of working groups of various industry chambers (e.g. the Polish Bank Association, Polish Chamber of Insurance). Millennium Towarzystwo Funduszy Inwestycyjnych is a member of the Chamber of Fund and Asset Management (IZFiA), while the Bank Millennium Brokerage House is a member of the Chamber of Brokerage Houses. The activities undertaken by these organizations are aimed at developing solutions to facilitate the application of incoming regulations and standardize the format of the data used.

[GRI 2-27] In 2023 the Bank Millennium Group did not receive information on any case of having violated environmental protection regulations.

2.5. ENVIRONMENTAL EDUCATION

[GRI 2-24, OWN DISCLOSURE 7]

At the Bank Millennium Group, we are aware of the importance of environmental education and building awareness around topics related to sustainability in the broadest sense. Our educational activities are aimed at different types of audiences, with tailored content and message forms.

Internal training

Each ecologically conscious and well-trained employee of the Bank Millennium Group is a sort of an ambassador who promotes care for the environment and the notion of the planet as a common good. This is why we attach special importance to employee training. In 2023, we launched a new online format training course "ESG - Environmental Issues," which is a continuation of the course launched in 2022. The training is open to all employees of the Bank and employees of companies from the Bank Millennium Group, and its purpose is to systematize and expand the knowledge of employees in the topics of sustainability and climate change and add practical knowledge of what measures are taken by Bank Millennium and what climate action we can take ourselves. As part of this training, employees also receive information about the ESG Strategy and the organization of the ESG area in the Bank Millennium Group. The training ends with a mandatory quiz.

The sustainability training program covered also members of the management boards of Bank Millennium Group companies, as well as selected managers and employees associated with the area of sustainable development. In May 2023, the Management Board of Bank Millennium participated in a workshop on the green classification of financial assets taking into account business practice and EU taxonomy requirements. In September 2023, the management boards of Bank Millennium and Mortgage Bank, as well as selected managers, participated in a workshop on ESG risk management. All Management Boards of Bank Millennium Group companies and selected managers and experts participated in a comprehensive ESG training program organized from September to October 2023, which covered, among other things, key ESG regulations, sustainable financing, ESG risk management, organization of the ESG process and supervisory requirements in this area.

Unique proprietary initiatives - Eco index

Environmental and climate change awareness can also be built through other initiatives. An excellent example is the activities organized around the annual event of the launch of the “Regional Eco-Innovation Potential - Millennium Eco-Index” Report developed in cooperation with substantive partners: the Patent Office of the Republic of Poland, AGH University of Science and Technology in Kraków and the Warsaw School of Economics, and had its first edition in October 2022. In April 2023, the Millennium Eco-Index 2022 report was published, expanded with comments from representatives of business, NGOs and local governments, as well as scientists. In November 2023, Eco-Index 2023 was released with new statistics. Bank Millennium developed the eco-innovation index in order to see how involved Poland’s regions are in green transition, as ecology, conservation of the environment and innovations become increasingly important in voivodship development strategies. The report helped to create a platform for discussing the importance and development of green innovation in Poland and also aimed to encourage cooperation, since, as our study shows, cooperation is conducive to eco-innovation. Bank Millennium’s active activities popularizing eco-innovation activities create a unique ecosystem for eco-innovation. The study showed that environmental regulations can stimulate innovation and that the implementation of environmental solutions, especially innovative ones, is an investment that pays off in the long run.

The Millennium Eco-Index consists of four sub-indices, developed on the basis of 17 variables. The idea behind the selection of variables was to take into account the wide range of economic and social activities that make up the eco-innovation process, as well as environmental awareness, which, in the opinion of the authors of the Millennium Eco-Index, is conducive to the eco-innovation process. The need for a broad discussion of eco-innovation is evidenced by the fact that the results of the Eco-Index in both the expanded 2022 edition and the 2023 edition were debated among experts at prestigious events including the international scientific conference “Circular economy - rational management of resources” organized by the Institute of Mineral Raw Materials and Energy Management of the Polish Academy of Sciences in Raclawice, the Edu Offshore Wind Educational Career Fair in Gdańsk, and the European Economic Congress in Katowice.

The 6th edition of the Family Business Forum, a joint initiative of Forbes magazine and Bank Millennium, was another excellent opportunity to create ESG awareness, this time among business clients. In this year’s edition of the project, organized under the slogan “Where to get the impetus for growth in times of economic slowdown?” Bank Millennium experts shared with companies its knowledge of how to build competitiveness of companies through projects supporting green transition. Bank Millennium experts have also authored articles in Forbes devoted to green transition, EU funds, eco-financing of investments and eco-innovation.

Networking at conferences and industry meetings

Another popular channel for environmental education at Bank Millennium is business meetings. Bank Millennium experts were guests at the 16th National Family Business Convention U-BIRTH in Kraków in November 2023, participating in debates and lectures on green financing, entrepreneurial development in the era of green transition and changing legislation related to sustainable development. In December 2023, a conference with speakers from Bank Millennium “Green Transition and the Competitiveness of Enterprises” was held at the DSW University of Lower Silesia, being a meeting of entrepreneurs, local government officials and scientists, combining the world of business challenges with creativity, ecology and social responsibility. Bank Millennium experts shared their knowledge on the topics of key aspects of green transition in the context of corporate competitiveness and the potential of family businesses in the era of digital, green and industrial transition, and eco-environment of innovation.

Webinars

Bank Millennium’s EU Funds Competence Center held a webinar in July 2023, available on YouTube, about the Environmental Loan with a non-refundable environmental bonus, as a form of subsidy for

companies that plan to invest in improving energy efficiency using new technologies. Bank Millennium has made this form of financing available to customers in the corporate banking segment in cooperation with Bank Gospodarstwa Krajowego implementing the grant project under the European Funds for Modern Economy 2021-2027 Program.

[GRI 2-28] In partnership with the CFO Club (an initiative set up by the ICAN Institute aimed at those in key finance positions) during a webinar entitled "CFO's Participation in the Implementation of ESG Strategies," the director of Bank Millennium's Sustainable Development Department discussed companies' new responsibilities related to the CSRD and the role of CFOs in implementing ESG strategies and reporting on sustainability issues.

Activities related to the UN Global Compact Network Poland

Bank Millennium participates in the Climate Positive Program, run by the Polish branch of the United Nations Global Compact.

In 2023, the UN Global Compact Network Poland and the Institute for Responsible Finance, in cooperation with the Ministry of Development Funds and Regional Policy and the Ministry of Finance, published the report "Green Finance in Poland 2023," which was presented at the European Financial Congress in Sopot. The publication features commentary by Joao Bras Jorge on the bank's commitment to sustainability, in addition to expert and academic texts in the ESG area.

Environmental education in cooperation with WWF Polska

Bank Millennium has been cooperating with WWF Polska since 2008. The joint initiatives aim to promote nature and climate conservation action. Beginning in 2022, activities revolve around the slogan "Forest - home for animals, breath for people and protection of climate." In 2023, WWF organized a special educational webinar for Bank Millennium Group employees. On International Volunteer Day, which falls on 5 December, they were able to learn about simple and effective ways to save the planet. A WWF expert explained why some initiatives make sense, while others, in which we often put a lot of effort, are not worth undertaking. The issue of ecological debt and programs in which WWF is involved was also raised.

For more information on cooperation with WWF Poland, see Chapter 2.2.3. "Environmentally-friendly products and responsible financing".

Internal pro-environmental campaigns

Under the tenet that pro-environmental behavior and everyday choices are at least as important as the environmental solutions implemented in buildings, the Bank runs numerous educational environmental campaigns. The organization is consistently building environmental awareness among its employees, clients and business partners by running the following campaigns, among others:

- **Push Yourself, Not the Button Campaign** - encouraging head office employees in Warsaw to use the stairs instead of the elevators. All of the elevator banks in the head office have posters advancing the campaign for leading a healthy lifestyle and choosing the stairs instead of the elevator as they move about on a daily basis. On top of the fundamental goal of building the well-being of employees, this campaign also aimed to minimize electricity consumption.
- **"Let's turn off our signs" campaign** During the winter months of early 2023, the campaign initiated in the autumn-winter period of 2022 to turn off light boards in its branches and offices in Warsaw, Wrocław and Gdańsk after business hours continued. This is how the Bank encouraged everyone to save electricity and reduce its consumption given the potential difficulties on the energy market. The campaign is also an expression of the Bank's continued concern for the environment and the need to manage resources reasonably. This campaign was widely promoted in the media, through articles and with a video. It has been calculated

that the electricity saved through this campaign is equivalent to the electricity needs of 62 households.

- **“We save electricity” campaign** - across the entire chain of its outlets, the Bank conducted an educational campaign reminding employees of the small things they can do every day to reduce electricity consumption. We additionally placed stickers reminding them of these actions in all social areas and toilets.



- **Collection of electric waste and expanding the reach and duration of the environmental charitable campaign** involving the recycling of plastic bottle caps collected in the Bank (the non-governmental organization cooperating with the Bank sells them as a recyclable raw material and it designates the proceeds obtained to help the poor).
- **A waste segregation process is in place in all offices and branches** Advising on changes to waste collection (marketing campaigns, new containers for selective waste with the appropriate logo). The new bins are located in the main corridors on each floor of the office, and bins for paper and mixed waste are also found in kitchen annexes.
- In addition, the Bank segregates other waste, e.g. expended batteries and it collects electrical waste. In 2023 the **Bank collected 150 kg of electric waste, 100 kg of batteries and 67 kg of plastic bottle tops** delivered by Bank employees.
- The coffee shop on the premises of the Bank’s Head Office in Warsaw has discontinued the use of plastic straws, and plastic packaging for sandwiches and cakes, while the staff recommends using your own mugs and dishes, and a fee is charged for disposable cups.
- Bicycle transport is encouraged and the infrastructure for cyclists is being expanded (additional bicycle racks and showers). Employees received the possibility of using another 3 showers installed in Gdańsk, and 23 bicycle racks have been put into use in front of the Gdańsk headquarters.

Climate education in Millennium Docs Against Gravity

Millennium Docs Against Gravity is the flagship cultural project supported by the Bank. It is the largest film festival in Poland and a major documentary film festival in the world. Bank Millennium has been a partner of the Festival for 18 years.

The festival informs viewers of many phenomena transpiring in the contemporary world and educates them through the films shown, meetings with artists and heroes and debates on the important topics presented on the screen. It discusses many important questions, from ecology to climate protection and environmental conservation, through diversity, politics, psychology, human rights, art (also avant garde), pop-culture, to family relations.

The topic of protection of climate and the natural environment, including forests that are critically important in combating global warming, is reflected every year in one of the most important festival sections: "Climate for Change". During the festival we present the most recent documentaries from across the world illustrating the burning problems related to the climate crisis and the measures that are undertaken in this respect.

For many years, driven by its commitment to the planet, Bank Millennium promotes protection of the environment and increased eco-awareness; this is why in 2023, for the purposes of the festival, it prepared an exceptional advertisement, which discusses the values that guide it as an institution. The spot was aired during the 20th edition of the Festival before films in cinemas and online: <https://www.youtube.com/watch?v=ssNEvt7Nxtk>



3. SOCIETY

BANKING INSPIRED BY PEOPLE

Bank Millennium's priority is to ensure that all of its clients have full access to its services. The Bank endeavours to support clients in the fulfilment of their plans and truly make their day to day life easier. Bank Millennium has been working on removing infrastructural, digital and physical barriers in access to financial and non-financial services by introducing solutions based on cutting-edge technologies.

3.1. INNOVATIVE SERVICES

[GRI 3-3, OWN DISCLOSURE 4]

Clients are increasingly used to digital solutions, so they expect to be able to do most things through remote channels. The Bank is therefore focusing on the digitalization of its services, with a strong emphasis on omni-channel solutions.

Bank = mobile application

The mobile application has become a special area of activity since it is acquiring new users from month to month. For most clients, the application is the main contact channel with the bank. Currently, the Bank boasts more than 2.7 million retail customers active in electronic channels, of which nearly 2.5 million log in to the bank on mobile devices. The application has positive user reviews on Google Play, App Store and AppGallery.

That is why the Bank has been steadily expanding access to financial services through mobile banking in line with the mobile-first model. We are expanding accessibility to daily banking services and credit, deposit and investment products. New customers are able to open an account directly in the application via a selfie.

Bank Millennium is one of innovation leaders on the Polish market. Our clients can choose from various payment methods without a card or wallet, using their phone, watch or wristband. They can use HCE, Apple Pay, Garmin Pay, Fitbit Pay and BLIK contactless payments. In 2023, we supplemented this offering with Google Wallet, expanded the availability of such solutions, including making BLIK contactless payments available to new customer groups (children and micro-businesses), and organized activation campaigns. Customers can also withdraw cash from ATMs using a BLIK code.

We are where our customers are, which is why we provide convenient and secure online payment methods. The Bank's customers can pay for online purchases with a BLIK code, by debit card and by defined transfer. In 2023, Bank Millennium, together with the Polish Payment Standard, continued work on a new service in the area of deferred payments - BLIK Płacę Później. Customers who buy online can take advantage of a shopping refund program.

In 2023, customers gained additional BLIK services based on transfers to a phone number. They can more easily settle accounts with relatives and friends thanks to the BLIK transfer request and the split-the-bill functionality.

Bank Millennium has also been the most versatile organization on the Polish financial market in terms of implementing open banking solutions. The Bank offers the option of aggregating accounts and ordering transfers from other banks; it also uses open banking in sales and acquisition processes (opening individual and business accounts).

More than a bank

Online access to the bank's products Access is definitely not enough: clients want something more. This is why, for several years now, Bank Millennium has been adding additional functions (VAŠs) to its digital channels. We started with a very easy top-up of prepaid phones and an innovative motor insurance buying process, gradually adding more services such as travel insurance with the innovative "Travel Assistance" option, buying tickets for public transport, paying parking fees, automatic motorway payments or even buying cinema tickets and online service codes directly on the bank's application. Soon Bank Millennium customers will also gain access to a currency exchange service through electronic channels.

In both the mobile app and online banking, the MilleUrząd section is available. Currently, the customer will find applications for benefits Family 500+ (800+), Good Start 300+, RKO and nursery subsidy. Some applications are also available in Ukrainian. The Bank's clients can use digital confirmation of identity as part of the Millennium ID service, which operates on the basis of mojeID. Customers can also register a sole proprietorship through the bank. We have integrated our systems with the mObywatel application. Customers can confirm their identity in this application by logging into the bank. At our facilities we honor identity documents issued in this application. Customers will soon gain the ability to apply for disability benefits.

Excellent UX

Customer experience is increasingly what determines the advantage of a solution over others. That is why the Bank involves its clients in the development process of designing digital solutions. The solutions that clients use on a daily basis in the mobile application and online banking system are also continuously improved. In electronic channels, the Bank is gradually abandoning its "institutional face" and adapting the fin-tech approach, simplifying not only communication based on the plain language principles, but also shortening processes. The bank has teams specializing in UX and UI design and UX writing specialists. For more than ten years now, the Bank has had a UX Lab, where

researchers conduct in-depth analyses, user interviews and test new solutions. Clients are always at the center of new solutions - all projects are inspired by their needs, habits, their language and the world surrounding them.

Offer in electronic channels for micro-businesses

For years Bank Millennium has blended innovation with designing convenient services in order to expand its offering for clients running a business. It gives them tools to support them in building a modern competitive business.

We allow customers without an existing Bank relationship to open a business account remotely, as well as the aforementioned process in which they can set up their own business and business account. The application is simple and transparent, more difficult concepts are properly explained and the client can also receive expert support through a chat with a screen sharing option.

The Bank launched a fully remote process of applying for a business cash loan and the possibility to submit an application and receive a credit decision online for loans with a de minimis guarantee.

The businesses that wish to accept contactless payments from their customers can use the Millennium POS application. The application turns a smartphone into a terminal for accepting payments and there is no need to order additional devices. This solution is especially convenient for entrepreneurs who travel to their customers.

In 2023, Bank Millennium, together with an external partner, released a powerful tool that supports small business owners with bookkeeping and cost control. We integrated the platform with online retail banking - the customer logs into the platform the same way they log into their corporate bank account.

A currency exchange and a payment gateway with an online store will also soon be available to businesses.

New solutions for Corporate Banking clients

We focus on the provision of comprehensive solutions based on modern technologies and on the digitalization of business processes. We develop digital channels and electronic document circulation paths.

We develop and integrate products that satisfy the needs of our clients and reinforce their positive experiences.

In May 2023, Bank Millennium released a new mobile application for business and corporate customers - Bank Millennium for Business. Fully digitized cooperation with companies is one of the bank's strategic goals, with a convenient mobile app as a key component.

The new mobile app was designed using the best practices we use for retail customers. The result is a user-friendly application, with a unique UX, ready to handle large volumes of data, both for small business owners and large corporations with extensive financial departments, including local government units or government agencies, even the largest ones.

Bank Millennium for Business is the best-rated app in Poland when it comes to banks' mobile apps for this customer segment (Google Play 4.6; App Store 4.3). The application was also in the finals of 2 competitions:

- Informa Banking Tech Awards In the category of Best Use of Technology in Corporate Banking.
- Fintech Awards

Loans

The offer of environmentally friendly products and responsible financing for Corporate Banking customers is described in Chapter 2.2.3 Pro-environmental Products and Responsible Financing.

Factoring and trade finance

In the factoring area, we have implemented solutions that streamline and speed up the processes involved in reverse factoring transactions, and have made changes that make reverse factoring more attractive. We have introduced the possibility to apply along with the loan for an additional factoring limit. Thanks to this we maintain an optimal financing structure, increase income and seal the transaction structure.

In the case of letters of credit and guarantees, for example, we have introduced the possibility of settling the payment of an import letter of credit with funds from reverse factoring, and in the transaction system we have introduced functionalities that speed up the process of preparing the content of the guarantee and digitize the transaction documentation. In the Trade Finance Module in electronic banking, we increased the security of transactions by introducing an anti-virus program that scans attachments added by customers.

Transaction banking and electronic banking

We consistently develop and make improvements so that customers can manage their company's finances even more efficiently and conveniently. In 2023, we carried out further implementations in electronic banking and expanded the availability of payment services.

New mobile application

We have provided our customers with a brand new **mobile application** for Android and iOS. We designed it completely from scratch using best practices. The construction of the new application was preceded by research and user testing to understand the needs and differences in the use of the application by large and smaller companies and their managers. We have created a unique-quality user-friendly application, with a new design focused on user convenience, with strong customization capabilities.

It is possible to log in to the new business application biometrically. It is ready to handle large amounts of data and is aimed at both small business owners and large corporations with extensive financial departments. In the application, multiple accounts can be managed simultaneously, in a single panel, and permissions for users can be assigned flexibly, according to the needs of the job.

The application informs the user of a number of events on the account, including account receipts, blockages, payments awaiting authorization. The simple interface reduces the operations' execution time. Business partners can be instantly checked against a white list of VAT payers. In addition, one can easily generate confirmations and statements in the app, which can be sent by email, Whatsapp, Messenger, Viber or any other messenger. Payment management is simple; users can authorize payments quickly and securely. There are two tiles on the main screen - authorization and rejected transfers, which allow you to handle these operations right away. Payments that are pending authorization can be highlighted and confirmed by the user with a single click. One click is also all it takes to accept a whole bunch of orders.

Thanks to the available PUSH notifications function, users can receive notifications of, among other things, new transactions awaiting authorization or rejected transactions.

Customers can order foreign transfers in all currencies to IBAN accounts to countries outside the European Economic Area and SEPA transfers. It is also possible to repeat the transfer from the operation history. This makes it easier for them to order a payment, for example to the Tax Office.

The application shows a full history of orders, who entered, modified and authorized them before a given user, which is especially important for large companies with multi-level transaction approval structures.

Customers can handle multiple companies in the application without having to log in again. They make their selection when they first log in from the start screen and have access to a view of each of their businesses.

The mobile application also features the Millennium Forex Trader currency exchange service, which allows you to conveniently and quickly exchange currencies, check current quote rates, set selected currency pairs on the screen and check exchange history.

Users can personalize the screen according to their needs and decide how the page looks after launching the application, they have the ability to rearrange and hide elements, add quick shortcuts like domestic transfer, foreign transfer, VAT, history, and they can also set the so-called dark mode. The application offers context-sensitive help - the system prompts for possible scenarios of use, e.g. in terms of parametrization of the home screen view and ways of selecting payments for authorization.

New functionality in the Document Module in Millenet for Corporates

We have released another functionality in the process of digital document exchange between the customer and the bank. In the Millenet for Corporates internet banking in the **Documents Module**, we have added a SEND tab. The new functionality allows customers to initiate the transmission of documents to the bank in pdf format. Documents are subject to automatic verification of qualified signatures, if any. Once the documents are received, a bank employee can approve them and forward them for implementation, or return the process to the customer with a request for completion. Documents are processed fully electronically without the need for hard copies, significantly reducing processing time and carbon footprint.

New type of identity document mObywatel (mDowód)

In line with regulatory requirements, as of 1 September, we introduced the possibility of confirming a customer's identity on the basis of mDowód. The electronic mDowód allows confirmation of identity without the customer having to show other identity documents.

Expansion of the network of deposit machines to include Euronet and Planet Cash machines

We have expanded the map of available **deposit machines** for corporate customers. Currently, customers can deposit cash additionally at 3,300 deposit machines in the Euronet network and at 2,000 Planet Cash network deposit machines in Poland. The service is available to any bank customer with a debit or charge card. Euronet and Planet Cash network machines are available in the most convenient locations, such as gas stations, popular chains and shopping malls, branches of selected banks as well as other locations such as airports, train stations and subway stations.

3.1.1. OFFER DESIGNED TO MEET CLIENTS' NEEDS

[GRI 3-3] Bank Millennium and the Bank's Subsidiaries offer products and services to improve their clients' living conditions, facilitating management of their finances and savings that are also environmentally friendly. Environmentally-friendly products are described in the section entitled "Environmentally-friendly products and responsible financing" while other solutions are described in section "3.1.3. Supporting clients in running a business".



The Bank's purpose is to provide convenient solutions that really make clients' lives easier and help them achieve their financial targets. This approach is illustrated by **Millennium 360° - A personal account present in the bank's offering as of April 2022.**

The Millennium 360° Account offering is universal and designed to address the needs of various client groups, irrespective of their age and income.

More and more Poles are using online banking on a daily basis. Surveys² show that over 80% of Poles use mobile banking regularly, while almost half of account holders have not visited a branch for more than six months. For 41% of Poles, convenient online banking is one of the two leading criteria for selecting an account, next to the absence of account fees. A Millennium 360° account - a free-of-charge account combined with a wide range of personalized services in a mobile super-app response to the client expectations.

With the new account, the Bank continues its strategy of developing services inspired by clients, developing the mobile super-app supporting clients in many aspects of their daily lives and implementing hyper-personalization. All elements of the new offering have been created on the basis of extensive research into customer needs and leading trends.

A Millennium360° account is unconditionally free. Moreover, after a simple condition is satisfied (5 payments via a card or BLIK, or 1 payment for people 18-26 years of age), the debit card as well as BLIK contactless payments are also free, and no commission is charged for withdrawals from all ATMs in Poland and abroad. This means that clients who have problems with mobility (older persons or disabled persons) may use ATMs in convenient locations without incurring fees for withdrawals from third party ATMs. Always unconditionally free are domestic transfers in PLN, standing orders and direct debits and BLIK transfers to a phone number.

Clients seem to appreciate the **Very Helpful Package**, offered in conjunction with the 360° Account, under which they can use home repair, medical or IT assistance services. Clients whose finances do not suffice to pay for doctors to make house calls may benefit from them in the event they or their child fall ill. This package also provides the assistance of a plumber or an electrician or the repair of equipment such as household appliances, radio and television equipment, smartphones and tablets. When selecting an account with the Very Helpful Package clients can take advantage of 7 interventions a year. The package is free of charge for 3 months after opening the account.

An important new feature of the account is **currency services**. Under the currency limit, the customer can pay with the account card in any currency without the bank's margin for currency conversion of up to PLN 1,000, at an attractive rate of the payment organization. The Currency Package, on the other hand, which customers can conveniently enable for themselves in the mobile app, priced at PLN 9.90 per week, includes unlimited currency transactions at the payment organization's attractive rate, with no additional bank margin for currency conversion.

The Bank continues to develop its online services, launching services that support daily needs of the clients. It combines the goodie purchasing platform with electronic banking, proposing the **Shopping Cashback** service, with a personalized presentation of offers of shops, a higher level of cashback for Millennium 360° clients and presentation of the cashback amount in the electronic banking system.

With younger clients in mind the Bank's offer also contains the **360° Junior Account** for clients who have not yet turned 18. As it is endeavoring to help them take their first steps in the world of finance, the Bank does not charge fees for account handling, while their debit card and withdrawals from ATMs are free of charge provided that they execute at least one payment a month using a card or paying by BLIK. Children aged 7 to 12 may use a mobile application and account card for the 360° Junior Account designed to meet the needs of the youngest users. These modern tools help introduce children to the world of finance and teach them how to use technology safely.

3.1.2. FINANCIAL INCLUSION

[GRI 3-3, FS14] According to "Social Impact Principles" of Bank Millennium Group our direct involvement in the implementation of the Sustainable Development Goals of the United Nations, is reflected in the strategic activities of the Bank Millennium Group, focused on finding innovative and integrating (preventing exclusion) products and distribution channels, and in the approach to customer service. Our goal is to provide products and services that promote counteracting social exclusion, including providing support to a part of society with fewer opportunities to use digital banking solutions, as well as to promote access to financial products.

The Bank's purpose is to dismantle digital and physical obstacles to financial and non-financial services. The bank's customers can use mobile devices and computers to access the bank's services, but also a number of additional solutions, such as in the mobile application, customers can buy public transportation and parking tickets, pay for motorway travel without having to stop at the gates. The electronic banking system also allows clients to use digital identity and engage in remote contact with Polish government offices. The Bank is striving for all our clients, including clients with disabilities to have convenient access to financial services. That is why many facilities have been implemented for blind and visually impaired people and people who use wheelchairs for their mobility.

- **Bank Millennium's website, the Millenet internet banking system and the Bank Millennium mobile app** are continuously being adapted to meet the needs of blind and visually impaired individuals. The websites are written in simple and easily understandable language for the user and may be read by automated text readers. A visually impaired user can use the website with a keyboard - the mouse is not needed to navigate the portal. Moreover, the site has a text zoom feature and is designed for high-contrast reading. Bank Millennium is one of the first companies to begin adapting its website to the needs of people with disabilities.
- **The websites and all client communications are written in simple language that is easily understandable for the user** and may be read by automated text readers. The content is created in accordance with the plain language principles and the plain language index (PLI) is monitored on an ongoing basis. For digital contents, the standard PLI is at 60%.
- **Users of suitable devices can log into the mobile app with a fingerprint or a face scan.** In 2023, customers also gained the ability to confirm transactions ordered on the mobile app using biometrics. Our mobile application is adapted to the needs of blind and visually impaired persons owing to its compatibility with access-enhancing services such as Google TalkBack (Android) and VoiceOver (iOS) that enable the presentation of information using speech. Clients can also use the assistance of a chatbot in the Bank's application. Our automatic assistant available 24 hours a day,

7 days a week may also serve as a valuable guide to daily banking. Clients can use the assistance of Milli in Bank Millennium's mobile application. It is capable not only of greeting and responding to various questions, it can also perform orders such as submitting a wire transfer. The bank is working hard on solutions that use generative artificial intelligence, with the goal of reaching the standards set by market-leading voice assistants such as Siri and Alexa.

- **Digital identity and building a digital society.** Users of the app and online banking can access official applications such as Family 500+(currently 800+), Good Start 300+, Family Care Capital and a nursery subsidy. Some of the data is filled in automatically, which significantly improves the form completion process. At the end of 2022, the Bank worked with mojID to launch Millennium ID, an identity confirmation service. It is a tool for confirming identity when dealing with public administration and when purchasing commercial services online. The Bank has also integrated with the mDowód 2.0 application and is honoring in its branches the electronic identity document issued through this application.
- **Bank conducts educational activities in the area of cybersecurity.** Communication is targeted to various client groups, including seniors, teenagers, parents of younger children, risk groups selected on the basis of risk profiles created in the Bank. On its website and in electronic channels, the Bank publishes warnings about new methods used by criminals. In addition to educational activities, technical solutions are also being introduced to further protect clients against cybercriminals. In Q4 2023, the bank implemented a solution whereby a bank employee can confirm his or her identity and verify a customer's identity on the bank's app during a phone call.
- **Clients taking their first steps in the digital banking area** have been able to use the www.bankmillennium.pl/pierwszykrokonline website since 2020.
- **Ukrainian citizens can find information in Ukrainian** on the bank's website. They can also use a special hotline number, where they will be served in their language. In addition, they can fill out an online application for family benefits in this language. They also receive communications in their language, regarding important matters such as application deadlines and cyber security warnings.
- **Children's app** - The Bank made a special version of the mobile application available to children aged 7 to 12. This app is not only a helpful gadget, but it is also a tool to introduce children to the world of finance and use technology safely. During activation the application recognizes the user and adapts the version to his or her age. The children's app supports payments by phone or BLIK. It is friendly to the youngest users and it was designed together with them - it has a simplified menu, children-friendly language and a made-for-children design. At the same time, it gives parents total control over a child's spending, special transaction limits and the option for a child to block a card, and for the parents to block a card using their application. The app grows with the child. After turning 13 years of age the version of the app installed in the birthday child's phone automatically changes to the currently available version for people up to 18 years of age offering a greater number of services.
- **ATMs and deposit machines** - disabled people with movement impairments can use the numeric keypad instead of function buttons next to the screen, which means that they do not have to reach too high. In addition, ATM's number keypad makes it easier to use the device also by disabled people with vision impairments. After headphones are connected to the ATM, the user may enter instructions through voice messages. Additionally, persons with vision impairments may use a special black and white

screen mode to enhance contrast and the legibility of displayed messages. 100% of Bank Millennium's own ATMs are customized to meet the needs of people with disabilities. As of April 2023, the network of deposit machines has expanded by an additional 5,000 machines from the Euronet and Planet Cash networks.

- **Access to outlets** with architectural barriers - nearly 70% of the Bank's branches are accessible to disabled people. When modifying and upgrading its branches, the Bank pays attention to eliminating architectural barriers.
- **Sitting customer service stations** accessible to wheelchairs are available at all our facilities.
- **Service over the phone** - clients using the Bank's Hotline can use the voice command feature during the call instead of using the phone's keypad.
- **Easier signing of agreements** - blind or visually impaired persons or people who cannot read can still sign an agreement with the Bank on their own in the presence of two employees of the outlet and - upon the client's express wish - a witness the client considers to be a trusted individual. In such cases, an outlet employee can also read the agreement aloud and/or in the case of customers who cannot write, **they can sign using an ink fingerprint.**
- Clients with special needs **have the right to receive the general terms and conditions of agreements and bylaws in forms that make it easier for them to familiarize themselves with their contents**, e.g.: a document prepared using a large font size, an audio file or a file prepared in the Braille language.
- **Service standards for the disabled** - detailed guidelines which are binding on the employees of all of the Bank's outlets.
- The Bank is also extending the idea of a world without barriers to other areas in which it is active, i.e. in patronage of culture. During Millennium Docs Against Gravity, Poland's largest documentary film festival, cinema films were available with audio description to **make it easier for people with vision impairments to access the world of culture.**

Bank representatives also participate in the work of the Polish Bank Association to enhance the accessibility of sites and services to people with disabilities.

The Bank constantly monitors the progress in the implementation of initiatives aimed at increasing the availability of banking services and products and promoting counteracting social exclusion. Information on progress in implementing these initiatives will be communicated in subsequent reporting periods.

Accessibility of the Bank's services	2023	2022	2021	2020
Number of outlets	374	406	440	477
[OWN DISCLOSURE 1] % of outlets accessible to persons with disabilities	70%	70%	70%	67%
[OWN DISCLOSURE 2] Number of franchise outlets	238	229	215	225
% of franchise outlets accessible to persons with disabilities	43%	40%	40%	39%
Number of ATMs	506	509	480	479
[OWN DISCLOSURE 3] % ATMs accessible to persons with disabilities	100%	100%	100%	100%

The information indicated above regarding the [FS14] indicator applies to the Bank Millennium Capital Group.

[GRI FS13] Access to financial services of Bank Millennium Group in areas with low population density and low economic activity

Access to financial services in areas with low population density and low economic activity	2023**	2022***	2021***	Change 2023/2022 [%]
Total number of points of access to financial services (total number of own outlets, franchise outlets and sales islands in shopping centres)	612	635	655	-4%
Number of access points to financial services in low population* or economically disadvantaged areas **	135	205	217	-34%
Percentage of the number of access points in low-population or disadvantaged areas in relation to all access points to financial services in Poland.	22%	32%	33%	-10 pp.

* The voivodeships with the lowest population density in Poland according to GUS (Central Statistical Office) data are as follows: Podlaskie, Warmińsko-Mazurskie, Lubuskie, Zachodniopomorskie, Lubelskie, Opolskie and Świętokrzyskie

** The voivodeships with the lowest economic activity in Poland according to the Bank's Local Data, are as follows: Lubuskie, Lubelskie, Opolskie, Podlaskie, Warmińsko-Mazurskie, Zachodniopomorskie, Świętokrzyskie (excluding Pomorskie)

*** The voivodeships with the lowest economic activity in Poland according to the Local Data Bank are: Lubuskie, Opolskie, Podlaskie, Warmińsko-Mazurskie, Zachodniopomorskie, Świętokrzyskie, Pomorskie

In relation to the analysis of reporting data for 2023, the area of low population density is the area of voivodeships with a population density of less than or equal to 100 people per 1 km² based on statistical data for 2022, while the area of low economic activity is the area of voivodeships with nominal GDP less than or equal to PLN 100 million based on statistical data for 2021.

3.1.3. SUPPORTING CLIENTS IN RUNNING A BUSINESS

The Group continues to take part in programs to support clients using public assistance.

Guarantee programs from Bank Gospodarstwa Krajowego

Bank Millennium continues to offer financing in the form of: loans, guarantee and letter of credit facility and reverse factoring, secured by guarantees from Bank Gospodarstwa Krajowego (BGK). Clients could take advantage of guarantees extended under two guarantee programs:

- Biznesmax - available to micro, small and medium-sized enterprises under two types of state aid: regional aid or de minimis aid.
- de minimis dedicated to businesses from the SME segment,
- the Liquidity Guarantee Fund addressed to micro, small, medium-sized enterprises and large corporates,
- the Liquidity Guarantee Fund for reverse factoring addressed to SMEs and large corporates.

Guarantee programs implemented in cooperation with BGK were continued on the so-called “Covid terms” until 31 December 2023:

- Biznesmax guarantees are extended free of charge to support investment and liquidity needs of businesses, allowing them to obtain a co-payment to the loan interest. The guarantee may cover revolving loans (including overdrafts) and non-renewable non-investment loans granted to provide liquidity. In addition to innovative entities, the guarantee is also available to eco-efficient companies that have implemented “green” solutions.
- In the case of the de minimis guarantee program, no commission is charged, and 80% of protection was maintained; the term of the guarantee was extended to 75 months for working capital loans and up to 120 months for investment loans, while the guarantee amount was increased from PLN 3.5 million to the equivalent of EUR 1.5 million.

At the end of December 2023, due to changes in state aid regulations that will take effect in January 2024, the Businessmax and Crisis Guarantee programs were terminated.

In December 2023, new agreements were signed with BGK to introduce new guarantee programs. In addition to the *de minimis* guarantee, which will operate under revised terms and conditions, the Bank has entered into cooperation with BGK on guarantees offered with funds from the FENG program:

- Biznesmax Plus guarantees are extended free of charge to support investment and liquidity needs of businesses, allowing them to obtain a co-payment to the loan interest. In addition to innovative entities - those introducing new products - the guarantee can also be used by environmentally efficient companies, and those that invest in modern digital solutions. What is new is the possibility of obtaining a subsidy to the investment loan principal.
- Ekomax guarantees are free guarantees that support SMEs, small mid-caps or mid-cap companies for thermal upgrades and investments leading to primary energy consumption savings of at least 30%, resulting from energy audits conducted by the companies.

The financing offer with the above guarantees will be made available in Q1 2024.

Millennium Leasing support for SMEs thanks to BGK guarantees

The company continued to actively offer leasing agreements secured with a Bank Gospodarstwa Krajowego guarantee. The offer is targeted at SME sector clients leasing low-emission vehicles, especially those that are less marketable. In 2023, Millennium Leasing sp. z o.o. had in its disposal a guarantee facility of PLN 300 million under the portfolio agreement with BGK. This facility was prepared in cooperation with the European Investment Fund from the Pan-European Guarantee Fund to support and protect entrepreneurs from the effects of the COVID-19 pandemic.

3.1.4. TOP QUALITY CUSTOMER SERVICE

Bank Millennium continues to implement its strategy to adapt the format and functions of its branches and remote service to customer needs.

For Bank Millennium 2023 was a period in which it continued to ramp up the accessibility of services in its remote channels in terms of communication and the ability to execute transactions. Bank Millennium focused on strengthening its capabilities in terms of client self-service while simultaneously providing support to employees.

Organizational changes in facilities and support from quality management units, help advisors exchange information and share experiences. Employees have the space to develop solutions that support service at the facility, including educating and encouraging customers to use remote channels. It is education that is the cornerstone in the process of convincing customers of new technologies and tools that facilitate safe and convenient banking. Relationship managers are focusing on changing customer habits and shifting from cash to non-cash service.

The Bank combines modern banking methods effectively and in line with clients' needs through its mobile application and transaction system with constant access to its highly qualified of branch advisors and telephone consultants in all its lines of business. The rapid growth of service provided by remote advisors, also for affluent clients, augmented convenience in access to the Bank's products and services.

Bank Millennium does its utmost to ensure that the client's transition to the world of electronic services is a positive experience. We also focus on the risks that users may encounter in the digital world. We want both clients and employees to be well prepared for the new challenges beyond digitalization. Bank Millennium is implementing projects focused on the customer perspective in the area of security.

The measures taken secure the needs of our various customer segments. We focus not only on the ability to choose the contact channel. We work to make sure that each group of customers, who have different needs and expectations, is properly taken care of. We tailor the language and presentation to age, level of financial literacy and experience in using state-of-the-art technologies. Employees and designed solutions help customers comfortably bank and use various services at a time and pace that suits them. We are working to maintain the synergy between the digital message and the traditional form of customer contact with the bank. The Bank is making it easier for people with disabilities to access its services.

Bank Millennium continues its efforts to enhance client satisfaction also in terms of the transparency of communication and simplifying the language used. We are changing the texts provided to customers from account opening to information on handling their products.

Bank Millennium continues its efforts to enhance client satisfaction also in terms of the transparency of communication and simplifying the language used. We are changing the texts provided to customers from account opening to information on handling their products.

Building processes and solutions based on clients' perspective translates into loyalty, satisfaction and a positive banking experience. According to the results of the internal customer satisfaction survey, 93% of retail clients were satisfied with their cooperation with Millennium, while the level of recommendations given by retail clients held steady - the NPS score in 2023 was 50 (unchanged until 2022). Corporate customer satisfaction and loyalty declined slightly, with an NPS of 40 (compared to 45 in 2022).

The quality-focused actions undertaken by the Bank have garnered appreciation in the most prestigious customer service ranking. Bank Millennium took first place in both categories of Newsweek's Friendly Bank ranking: traditional banking and the remote module. The Bank also came first in the Gold Bank ranking in the category of best customer service. In Forbes magazine's Company Friendly Bank ranking, Bank Millennium took second place.

3.1.5. CUSTOMER SERVICE STANDARDS

Bank Millennium has uniform client service standards across all of its contact channels. They are customized to the type of unit, the tasks fulfilled and the adopted business model. Standards are available for employees of outlets, teams providing services to Prestige Clients, Corporate Banking Clients, teams dedicated to the Hotline, electronic communication, the unit handling client complaints and employees of the Bank's Head Office. All guidelines are discussed in detail during preliminary training and exercised in practice.

At Bank Millennium, we are improving our customer service models in such a way that they allow us to maintain a balance between the customer's needs and the adopted business assumptions, and meet formal and legal requirements.

We design service models based on the basis of surveys and tests with clients using design thinking, creative techniques and behavioral economics.

We monitor the implemented standards and models regularly, so we know when and what elements should change. On this basis, we improve them by adapting them to the changing needs of our customers and the market environment.

Client Service Standards provide specific guidelines of conduct on how to greet/say goodbye to clients, talk to clients, present the Bank's products, clarify doubts and handle clients' complaints.

The Client Service Standards in force in the Bank's outlets and hotline are the basis for the scripts functioning in the Bank for talking with clients about various product groups:

- Opening a relationship with a new customer (personal account and accompanying products)
- credit products
- savings and investment products
- digitalization and self-service through ATMs/CDMs (support for the process of transforming into branches with automatic cash handling).

Client Call Scripts define the framework of calls with clients on the bank's products. These scripts refer to specific parts of client service, procedural and regulatory duties. The service standards are to limit the risk of unethical sales and providing clients with insufficient information.

3.1.6. RECOGNIZING CLIENT EXPECTATIONS

Recognizing clients' expectations is always the first part of each and every project in Bank Millennium. The outcome of this approach is verifying, and then modifying a process, product, communication or client service model. Regularly performing this activity makes it possible to maintain the quality of service at the highest possible level in every service channel and observe trends on the financial services market.

The results of the research are presented to the relevant business units, as well as at a special meeting - the CX Forum, which is held every two weeks with selected members of the Management Board. The purpose of this meeting is to show current information on the evaluation of products and services by the Bank's customers, as well as to make decisions on improving the customer experience.

In 2023 Bank Millennium conducted quantitative and qualitative research on market trends and specific product and service assumptions. Projects employing Service Design methodology in which fully understanding clients' needs is crucial also provided inputs. These projects contributed to streamlining service quality and developing the product offering.

Just as in previous years, this research was conducted using samples of retail, corporate and affluent (Prestige) clients and microbusinesses (Small Business).

Quality and satisfaction surveys Bank Millennium	2023	2022	2021	2020	2019
Number of surveys conducted	40	31	56	47	25
Number of Mystery Shopping visits	2 694	3 890	3 854	3 059	2 768

Satisfaction and the level of recommendations among retail clients remained very high, with an NPS score in 2023 of 50 and 93% satisfied clients.

Bank Millennium	2023	2022	2021	2020	2019	2018	2017
NPS ratio *	50	50	51	53	53	51	51

**indicates the willingness to recommend the products and services to clients. The presented data refer to the Bank's internal research and pertain to retail clients.*

Millennium Leasing cooperates with Bank Millennium to monitor helpline calls on an ongoing basis, in terms of the volume of calls, quality of service and identifying the reasons why clients call. A permanent element of the monitoring is a survey, in which clients are able to share their feelings or remarks directly after their call with a helpline consultant. The information collected and analyzed is used to continuously improve the quality of customer service on the helpline. The key measures illustrating progress in this respect include: FCR, evaluation of the quality of the helpline operations and evaluation of the quality of the consultant's assistance. At the same time, regular analyses are carried out to find out the reasons why customers contact the helpline, and customer calls are listened

to. The goal is to develop solutions that will permanently eliminate the root cause of the problem and the reason why clients to call the helpline with a particular topic. Listening to clients' voices has allowed us to reduce the number of incoming calls by 34% in 2023.

3.1.7. COMPLAINTS MANAGEMENT

The Bank's goal is to build the best possible customer experience in the daily use of our services, to understand their needs and the barriers they face in their relationship with the bank, so that satisfaction with the service constantly increases. The documents governing the issues related to complaints are the product rules and the "Complaints Handling Instructions". The results of this policy are visible, inter alia in the streamlining of complaints handling processes, the shortening of the time to examine cases and the empowering of employees who have been trained on the rules of plain communication with clients. To mitigate reputational, legal and financial risks, the Bank has implemented internal regulations aimed at ensuring full compliance with the Act on complaint examination by financial market entities and on the Financial Ombudsman and about the Financial Education Fund and the Payment Services Act. On 18 July 2023, the Management Board of the Polish Bank Association adopted "Best Practices for Managing the Complaint Process in Financial Institutions." They present the ZBP's recommended standards for managing the complaint process by banks. They seek to unify the approach in the market as to the role and purpose of the units managing the claims process, the structure, as well as the necessary competencies. The Bank analyzed the compliance of internal regulations and processes and took adequate adaptation measures.

Clients may submit complaints through many channels: in the branch, by phone, through electronic banking and by mail. [GRI 2-29] We thoroughly analyze the information about the perceived imperfections, but also the needs that customers report to us, and use it to improve our products and processes. Information received from the regulatory authorities (UKNF, UOKiK, PUODO) is also important to us. Areas where we identify potential nonconformities and risks are analyzed by us and the findings are forwarded to the Compliance Department for inclusion in the risk map. In order to reduce the number of complaints and prevent their causes, we work in three areas:

- ✓ Prevention - we give opinions on the implementation of new products and services at the stage of their preparation, and participate in process reviews;
- ✓ Elimination - we identify imperfections in processes and products based on reported complaints;
- ✓ Emergency - we work to reduce the impact of unexpected failures on customers, so as to minimize the number of reports.

Thanks to such efforts, a total of 145 new initiatives were addressed in 2023 as part of the Voice Of Customer (VOC) complaint cause elimination program, 114 of which we successfully implemented. They have significantly reduced both the number of complaints received by the Bank and the potential additional reports that have not been registered thanks to them. Since 2023, the initiative to eliminate the causes of complaints has been carried out by dedicated individuals within the Quality Department.

We have taken multiple actions to streamline the complaints handling process to shorten the time for examining complaints and increase the level of client satisfaction:

- We register all complaints (retail and corporate) in the central complaint registry MilleResolver2, which is used to record and handle claims. In 2023, we have introduced a number of changes to optimize daily work in the application. In the process of handling complaints, we use and systematically develop machine learning tools. By streamlining, automating, expanding and introducing new tools, we are optimizing our processes, resulting in improved quality of response to the customer and shorter waiting times. This, in turn, has helped increase customer satisfaction.

- In 2023, we continued the "Direction towards Quality" project, whose main objectives are:
 - ✓ Regular e-mail education for employees responsible for processing client complaints.
 - ✓ Regular workshop to develop plain language writing skills and increase empathy in solving customer problems.
 - ✓ The monthly qualitative evaluation of responses to complaints in the following terms:
 - the merits and the solution of clients' problems
 - the structure of the information (visual transparency)
 - crafting sentences in accordance with the rules of plain language
 - maintaining relations.
- In 2023, we conducted continuous monthly monitoring of customer satisfaction with the complaint process. Research indicates a high quality of the resolution of the customers' problems:
 - ✓ 79% - Plain Language Index score - PLI for complaint processing units,
 - ✓ 87% - the result of the qualitative evaluation of the answers.

The high quality of problem resolution and response translates into high customer satisfaction with the complaint process - 86% in 4Q2023 (satisfied and very satisfied). Customers rate increasingly better:

- ✓ understandability of responses - 92% in 4Q2023 (satisfied and very satisfied),
- ✓ completeness of responses - 91% in 4Q2023 (satisfied and very satisfied),
- ✓ response time - 87% in 4Q2023 (satisfied and very satisfied).

Thanks to the measures taken, in 2023 customer satisfaction with the complaint process increased by 5% compared to the previous year. The year 2023 is the best since the survey began.

Client satisfaction with the complaints handling process in the Bank	2023	2022	2021	2020	2019
Clients satisfied and very satisfied with the complaint process	85%	80%	82%	79%	This research was not conducted *

* on account of the operational merger with Euro Bank

- We continued the Close The Loop 2.0 program, which involves contacting customers who commented negatively in a telephone satisfaction survey about the complaint handling process. The goal is to use the feedback of the customers to improve the products and services provided by the Bank and thereby increase customer satisfaction.
- We continued the "Embrace the Problem" quality initiative. It is designed to support front-line employees in solving customer problems. Employees periodically receive information on how to solve the customer's problem at the first contact.
- In 2023, we have optimized the process of handling card complaints, thanks to which the customer receives a refund much faster. At the same time, we have expanded the process of recovering these funds through the chargeback procedure.

We also have mechanisms to provide complaint documentation to interested individuals and institutions in an automated manner.

We forward complaint reports, including daily notifications to experts, to the people responsible for individual products and processes. This allows the Bank to analyze the quality of services it offers on an ongoing basis and take optimization and elimination measures.

We also have a broad set of performance indicators and risks from the complaints area. We periodically report management information on the complaint process to the level of Organizational Unit Directors, members of the Bank's Management Board, as well as discuss it during meetings of the Process and Operational Risk Committee and meetings of the Supervisory Board Audit Committee. Reporting cycles range from daily reports to monthly and quarterly reports.

Group subsidiaries manage complaints on their own. Millennium Leasing has in place the procedure for submitting and reviewing complaints submitted by the clients. Complaints are registered in a dedicated Complaints Handling System (SOR), which enables the monitoring of time limits and reporting in order to improve quality review of these processes. In 2023, Millennium Leasing maintained last year's goal of reducing the time taken to process complaints from 25 to 7 business days. In 2023, the Company has also taken initiatives to reduce the number of complaints it receives.

Millennium Towarzystwo Funduszy Inwestycyjnych (TFI, investment fund management company) offers its products through distributors of units and does not have direct contact with clients. Clients' complaints are submitted to Millennium TFI and distributors alike. The Bank reviews complaints related to client service provided by its employees. When it comes to the quality of products offered by Millennium TFI, complaints are handled under an engagement from the TFI by the transfer agent who keeps register of participants and executes transactions pertaining to units.

3.1.8. CYBERSECURITY

The Millenet internet banking system and Bank Millennium's mobile application were designed in such a way that they are not only very convenient to use but also very safe.

Certificates and encrypted connections

The usage of encrypted data transmission between the client's computer and the Bank's server ensure the safety of Millenet internet banking. Transmission is secured with a TLS 1.2 protocol. Bank Millennium employs the GeoTrust True BusinessID /EV SSL certificate issued by trusted certification authority GeoTrust, which specializes in data encryption and protection. This security ensures data protection against interception by undesirable persons. This certificate also guarantees that the login page belongs to the institution to which it was issued. The internet connection with a phone is also encrypted.

Every PDF document downloaded from Millenet is signed with Bank Millennium's safety certificate. That makes it possible to track with ease whether anyone has altered its contents after signing.

Every document placed in Millenet in the section "Information on changes" has a unique checksum (a cryptographic hash function using SHA 256). Any change to a document triggers a change in the checksum. Documents containing a checksum are signed using an electronic certificate that utilizes a time stamp.

Bank Millennium uses four different certificates to sign PDF documents. All of them are characterized by an identical parameter "O" (Organization) Bank Millennium S.A. and a list of attributes that, when they appear together, form the unique data of a given electronic signature.

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Certificates used by Bank Millennium:

- Confirmation of integrity, issued by Certum Digital Identification CA SHA2
- Bank Millennium S.A., issued by Certum Digital Identification CA SHA2
- Bank Millennium S.A. (OU=DBE), issued by COPE SZAFIR - Qualified

Logging into an account

To log into Millenet several data known only by a given client must be provided: the login, password and selected characters from an identification number. Moreover, we ask clients for additional confirmation of their login using a password by SMS or Mobile Authorisation. Clients may also choose a safety icon related to their login. This icon makes it possible to determine whether the client is logging into the Bank’s website or to a deceptively similar site copied by criminals.

Before a client starts to use the mobile application, it must be activated. The activation process includes entering the pertinent data known only to a given client and confirmation through an IVR connection. During the activation process the application is assigned to a given device. That is why clients must repeat the activation process every time they switch to a new device. In 2023, the activation process has been supplemented with additional verification in the case of higher-risk users who are selected by a special algorithm.

Logging into the application is secured using a 4-digit PIN code which clients select on their own. It is also possible to log in using biometric data if a device supports that option (thumb print, facial scan). After a short period of inactivity, the customer is automatically logged out of Millenet and the mobile application.

If a client loses his or her handset with the installed application, he or she can rapidly block the mobile application in Millenet or through the hotline.

Payment safeguards

Wire transfers and payments submitted in the electronic banking system, or card transactions carried out remotely, i.e. without a physical presence of the card, must be authorized.

- 1) 3-D Secure is an additional security measure for online card transactions, for example in online stores. It protects the buyer’s identity and transaction data. Payments in stores displaying the Visa Secure or Mastercard Identity Check logo are additionally confirmed by the client using one of two methods: an SMS Password after logging into Millenet in a new browser tab or by logging into the mobile app.
- 2) SMS passwords - are non-recurring free codes which we send to the client’s phone number. The code in the SMS should be keyed into the designated spot in the payment form and approved by clicking on it.
- 3) Mobile Authorization - is a method of approving transactions submitted in Millenet in the mobile application and some transactions submitted in outlets. To utilize this form of confirmation clients must have an active application.
- 4) Confirmation of a wire transfer and payments the application - clients confirm wire transfers submitted in the application not by using the PIN number to the application but by using the password to log into Millenet.

An additional layer of protection is provided by fraud prevention and detection mechanisms:

- technical safeguards in the mobile application for both system platforms, i.e. Android and iOS, implemented in 2023 to prevent the recording of sessions using remote desktop software

- implementation of an advanced mechanism for real-time monitoring of fraudulent transactions in the electronic banking SYSTEM and monitoring of customer authentication in the 3-D Secure service for remote card transactions.

It is also possible at any time to block a card temporarily or permanently in Millenet or the mobile application. Clients do not have to wait for a connection to the hotline or for an outlet to open.

Dodatkowe zabezpieczenia

In response to current fraud scenarios, the bank has been implementing solutions to protect the customer and the bank when concluding a cash loan agreement for several quarters. From 2022, the bank also uses Onfido solutions based on biometrics (the process of opening an account using the so-called selfie) when establishing relationships with customers.

In 2023, the Bank developed an additional mechanism to protect against a very popular crime scenario in which a fraudster impersonates a bank employee. The security allows the customer to make sure that he is talking to a bank employee, and allows the consultant to verify the customer's identity efficiently in the bank's application during the call.

3.1.9. INITIATIVES TO ENHANCE CLIENTS' FINANCIAL AWARENESS - FINANCIAL LITERACY

EDUCATION ON SAFE ONLINE BANKING

[GRI FS16] The problem of fraud or embezzlement in which bank clients are the injured parties pertains to the entire banking sector in Poland and across the globe. Since client awareness is of key significance in each such case in terms of safely using online financial services, banks, and that includes Bank Millennium, intensively educate their clients in collaboration with the Polish Bank Association and unilaterally, reminding clients about the online risks they face and the need to comply with security rules. Bank Millennium publishes security warnings and recommendations on the rules of safety on its website. Whenever the Bank receives information about a new criminal action or a new method of fraud, it immediately publishes warnings to clients in its portal, in special campaigns and on social media. Bank Millennium also pursues many preventive measures and responds to every signal that may be an attempt at deceptively obtaining client information or funds.

The number of fraud attempts using electronic channels remains high since 2020, so the Bank continues the educational activities. Clients have continuous access to information and video materials on the bank's website and in a special tab in the mobile application. As part of the "Spr@wdzam" campaign, Bank Millennium opened a special page with quizzes on its portal, where clients can test their knowledge of security issues and learn new information (<https://www.bankmillennium.pl/sprawdzam>). The quizzes were supplemented with video clips imitating a game show format. The films were also published on the bank's channel on YouTube.

Educational campaigns for clients are delivered using various channels:

- banners on a portal, in the mobile application and Millenet,
- PUSH messages in the mobile application,
- messages in the contact box available from Millenet and the application,
- SMS to clients who are less active in electronic channels.

The campaigns are regularly updated and directed to various audience groups, including seniors, teenagers, parents of younger children, and also to groups selected on the basis of risk profiles created in the Bank. We see the need for additional communication with non-Polish-speaking clients, which

is why we prepare communication in English and occasionally in Ukrainian. Communication plans and content are created as a result of cooperation between several departments, chiefly the Security Department, the Electronic Banking Department, the Quality Department and the Client Knowledge Department. Additionally, we examine clients' needs in this area to best match educational activities to their level of knowledge and expectations.

Cybersecurity issues are also discussed in other contexts, e.g. when establishing a relationship with a new client, or when submitting an electronic cash loan application.

Clients may also call a special helpline manned by a team of consultants trained in cybersecurity.

Also available on YouTube is a series of videos featuring children and with commentary from the Bank's expert, which were created as part of the Bank Millennium Foundation's activities.

Onboarding new customers

All new customers, regardless of how they have established a relationship with the Bank, receive a series of communications that introduce them to the capabilities of their account, the mobile app and Millenet, as well as the Bank's offerings. The communication is personalized according to relevant criteria so that the information offered is of value to the customer, e.g. if the customer has already started using a particular option, he or she will not receive the message in which it is presented. In onboarding communications, we also address issues related to the security of electronic channels and good habits in the context of cyber security.

OTHER EDUCATIONAL ACTIVITIES TARGETING CLIENTS

Corporate Banking

We support companies in their development through educational activities. We provide information on important changes affecting the conduct of business and offer access to the latest information on modern solutions and financial management. We share our knowledge during webinars, meetings with companies, and articles, as well as within the electronic channel Inspiration Zone in internet banking Millenet for Corporates.

Webinars for Corporate Banking clients

We held two webinars on subsidy competitions in which we are a partner bank - a technological loan and an environmental loan with internal as well as external experts, and a webinar with the bank's chief economist, Grzegorz Maliszewski, on the outlook for the economy in 2023.

Each event was attended by more than 100 people, or about 70% of all those registered. The great substantive value for our clients can be seen in the numerous questions and the long Q&A sessions.

Inspiration Zone in the Millenet for Corporates transaction system

In the Millenet for Corporates transaction system, customers have access to the Inspiration Zone - a section where we publish useful information and materials in various fields. In 2023, we published articles devoted to, among other things:

- current macroeconomic analysis,
- available public aid to companies,
- organized events for customers,
- cyber security.

Cooperation with the CFO Club of the ICAN Institute

We have been engaged in a long-lasting cooperation with the CFO Club of the ICAN Institute. The CFO Club is a development and networking initiative that brings together CFOs of companies operating in Poland. Representatives of companies can participate in both webinars and in presentations during onsite meetings. The CFO Club offers access to current knowledge and serves as a platform for sharing experiences and networking. The topics discussed during the meetings are related to the most current challenges facing CFOs and those responsible for finance in the company. In 2023, the subjects of the meetings included:

- modern methods of financial management,
- data analytics and artificial intelligence,
- ESG strategy,
- effective cooperation and communication.

Experts at the meetings included the Bank's representatives and experienced practitioners in their fields. The Club currently has more than 900 members. The webinars and meetings were very popular with clients. On average, about 100 people attended the webinar.

Collaboration with Forbes Magazine - Family Business Forum

As part of the 6th edition of the Forbes Family Business Forum - a joint initiative of Forbes Magazine and Bank Millennium - 9 meetings with entrepreneurs were held across Poland. It is a regular annual event bringing together family businesses. Bank Millennium has been the Strategic Partner of the Family Business Forum since 2018. During this year's series of meetings, a lot of time was devoted to the necessity of applying the principles of sustainable development and the importance of investments in this area, among others, taking into account financing under EU support.

Bank Millennium as an event partner for companies

In 2023, we were a major partner of, among others:

- conference entitled "Green Transition and the Competitiveness of Enterprises" organized at the DSW University of Lower Silesia in Wrocław. It was a meeting of entrepreneurs, local government officials and scientists, during which presentations were made on key aspects of green transition in the context of corporate competitiveness, including, among others, a presentation by the Bank's Expert on "Financing Green Technologies in the Energy Transition."
- The 16th National Family Business Convention U-RODZINY, organized by the Family Business Initiative under the slogan "Invention and Innovation in Family Businesses." The debates with the participation of the Bank's representatives showcased the potential of family entrepreneurs and discussed key issues concerning the clash between family businesses and the harsh business reality - digital transformation, the green revolution, succession, as well as the implementation of innovation and eco-innovation.

During the 31st conference of the Polish Corporate Treasurers Association PCTA, we led a workshop on cyber security and fraud prevention. We were also a partner of the European Economic Congress in Katowice, where discussions included the economy's impact on the environment and climate, prospects for economic development, the green transition of the power sector and industry, and the raw materials crisis.

Bank Millennium's proprietary debate entitled "Eco-innovation" touched on a number of topics relevant to the development of eco-innovation in Poland, including how to make innovation in companies,

institutions and local governments have a real impact on the environment while maintaining business efficiency. A Bank's representative also took part in the debate "Family businesses - problems of succession."

Client satisfaction surveys

In the third quarter, we conducted our annual client satisfaction survey in the corporate banking area. In the survey, which lasted for several weeks, corporate banking clients answered questions regarding their assessment of products and service quality. As many as 95% of our customers are very or rather satisfied with their relationship with their relationship manager. The high evaluation of our consultants is noteworthy, since as many as 99% of our clients are very satisfied or rather satisfied with their work.

Individual clients

In 2023, the Bank continued its regular meetings with clients, which took the form of webinars. The main audiences were customers of the Prestige and Private segments and a selected group of customers of the Retail segment. The topics of the meetings were very diverse, and their evaluation was again high.

In addition to meetings on investment topics (the market, current events, macroeconomic forecasts), participants had the opportunity to meet, among others, specialists in the fields of social research, real estate analysts, as well as Bank Millennium experts responsible for the development of modern technologies and artificial intelligence.

The number of registered participants in this event in 2023 exceeded 5,400 people.

In 2024, Bank Millennium intends to continue its webinar series and educate its customers in various areas of life.

3.2. RESPONSIBLE ADVERTISING AND SALES

3.2.1. RELIABLE MARKETING COMMUNICATION

Reliable advertising and marketing communications policies

[GRI 3-3, 417-1] The Bank has the following internal regulations on the rules for creating informational and advertising materials:

- "Instruction - rules for devising materials, including commercial publications on products and financial instruments in Bank Millennium S.A.";
- "Rules for devising commercial publications for the financial products and instruments in Bank Millennium S.A."

In addition, the information and advertising materials prepared by Bank Millennium are compliant with the laws and regulations applicable to this area, including in particular:

- The Recommendations laid down by the Code of Ethics in Advertising developed by the Advertising Council and the Advertising Ethics Commission
- the Principles for Advertising of Banking Services of 2008 laid down by the Polish Financial Supervision Authority,
- the Best Practices on consumer loans advertising standards of the Polish Bank Association of 2015,
- Provisions of the amended Consumer Credit Act of 22 October 2017,
- Mortgage Loan and Supervision of Mortgage Loan Intermediaries and Agents Act,
- Act on Trading in Financial Instruments.

In the process of developing marketing communication we adhere to the following recommendations and principles: **Bank Millennium's advertisements are not misleading and show the important features of the products and services and related benefits and costs.** They also depict their legal nature and provide information about the level of possible risk carried by the client. If the message pertains to a promotional offer, its conditions are specified. Clients are also advised on where they can obtain detailed information regarding a given promotion.

Bank Millennium has a Marketing Communications Department whose task, in cooperation with other organizational units of the bank, is to work out and devise information and advertising materials. The department is staffed by people with experience and specialized expertise in marketing communications.

Any change or introduction of a document or marketing material for buyers of respective products is preceded by consultations within the Bank, verification by the legal, compliance, marketing communication and product teams, in order to provide clients with a clear and reliable, legally-required information about the products offered. Implementation of the marketing communication standards reduces the reputation risk and the risk of sanctions for non-compliance with the regulations.

Millennium TFI advertises products solely on its website and through distributors of units. The method of advertising products complies with the provisions of law regulating the operation of investment funds and investment fund management companies and the guidelines of the Polish Financial Supervision Authority. To the extent to which product advertising is not subject to detailed

regulations TFI submits to the standards of the Bank Millennium Group, including standards of ethics and it does not use messages that are forbidden by law in its advertising.

TFI has adopted for application the Corporate Governance Principles for Supervised Institutions and it strives to adhere to them in reference to practices pertaining to advertising messages. TFI submits to the standards of the Bank Millennium Group in all other aspects.

[GRI 417-3] In 2023, there were no recorded cases of Bank Millennium and Group entities failing to comply with regulations governing marketing communications.

3.2.2. TRANSPARENT INFORMATION ABOUT PRODUCTS AND SERVICES

[GRI 3-3] The Bank provides clients with clear and understandable product information through its employees, in sales channels and client service channels such as outlets and the hotline, and in the form of text messages in electronic channels. All the **employees** who provide clients with information are **properly trained** in the scope required by the law, sectoral regulations, best practices and quality standards implemented by the Bank. **Bank employees are informed on an ongoing basis about any significant changes** in sales and client service, which is done through the Bank's various internal communication channels. The product sales process is executed on the basis of standardized models making it possible to **present an offer to clients that is adjusted to their needs and expectations** with options that may be of interest to them, along with the information necessary to make an informed decision about the scope of the given product purchased. The observance of sales standards and the scope and quality of information provided to clients are evaluated on a regular basis through Mystery Shopper surveys and as part of client satisfaction surveys. The selling and client service method is also verified and improved using topics of inquiries and complaints received from clients.

Informing about bank accounts

One of the fundamental goals is to find the right match between the offer and the needs of every client. The Bank strives to ensure that offers / services are presented after an in-depth needs analysis and meet the expectations of clients, while being fully comprehensible and transparent to them. In the process of opening an account and initiating a relationship with a client, employees use aids that are prepared in an attractive format, are highly transparent and feature clear and comprehensible language for the purpose of communication. These materials have been developed on the basis of in-depth research and interviews with clients and are used to diagnose client needs correctly and optimally and adapt the sales pitch accordingly.

Every person visiting the website may obtain detailed information about the offering and the services recommended by the Bank depending on the client's current needs. There is also a hotline available to clients 24 hours a day and 7 days a week.

[GRI 2-27] In 2023 no penalties were imposed on the Bank in terms of personal accounts, nor were there any consumer boycotts.

Informing about savings products

Information on savings products in the form of a set of the most important attributes or in more detail, while paying attention to the constituent elements of given products may be found on the Bank's website, may be obtained in any branch, through the hotline or in electronic banking channels. The Bank regularly improves the method of presenting product information, especially in its remote channels. Employees are trained in such a manner so as to be able to convey a given scope of information on every product, including a uniform information document on the scope of savings products in which one can easily and readily compare the attributes of all products. The Bank also analyses clients' questions and complaints to eliminate their causes.

[GRI 2-27] In 2023 no penalties were imposed on the Bank in terms of savings accounts, nor were there any consumer boycotts.

Informing about investment products

Marketing materials prepared by the Bank comply with the laws and regulations applicable to this area, including the Canon of Best Financial Market Practices and the guidelines laid down by the Polish Financial Supervision Authority. Bank Millennium tracks and modifies materials on an ongoing basis to meet the recommendations of the Polish Financial Supervision Authority. Trade publications are subject to review by legal and compliance teams, among others. These units are responsible for ensuring that materials are in compliance with the law and with the guidelines of supervisory authorities.

In addition, prior to purchasing an investment product, clients fill out an Investment Survey. Its purpose, among other things, is to verify a client's knowledge and experience regarding financial instruments and services and check whether a client belongs to the target group of recipients of a specific instrument or service.

Based on the responses provided, the client receives the Investment Survey result with information about the financial instruments and services for which the client is part of the target group and which of them are suitable or unsuitable to that client. In accordance with prevailing laws, the Bank does not apply limitations on the sales of investment products to specific groups of people.

Security of investments

The Bank complies with the requirements of the MiFID 2 directive (Markets in Financial Instruments Directive). In accordance with the requirements of MiFID 2, the Bank, by offering investment services, is obligated before the purchase of a product, in particular:

- to classify the client to one of the three categories of investors,
- to carry out an Investment Survey, which is designed to test the client's knowledge and experience with individual financial instruments or services, as well as to check whether the client belongs to the target group of recipients of a specific financial instrument or service,
- to provide reliable information that is not misleading about products and risks associated with investments in those products as well as all the related costs,
- to develop a policy of acting in accordance with the best interests of its clients and a policy to prevent the conflict of interest and inform the client about these policies.

All the marketing publications prepared by the Bank describe, among others, the risks associated with investments and sample scenarios related to a given financial instrument or product. Clients are presented with complete and reliable information on the Bank's own products and products distributed by the Bank, including their issuers and the terms of the complaint process. Information on services rendered, agreements and other bank documents and letters sent to clients are drafted in a precise, comprehensible and transparent manner.

[GRI 417-1] Any information materials concerning investment products offered by Bank Millennium provide relevant information on the risk associated with investment, legal disclaimers as well as the sites where additional information on the funds (for example on funds or selected financial data) is published.

If a client wants to purchase a product the Bank considers to be unsuitable or if the Bank does not have the ability to assess a given product, the Bank advises the client thereof by issuing a warning to the client during the process of submitting the order. The client also receives this warning on the order form. The client is obligated to review the warning and if the client still wants to buy the product, the client is obligated to accept it. Similar rules apply to the target group evaluation process.

Before starting to offer investment products, the relationship manager should have at least twelve months of professional experience in this area and have passed a product knowledge test. Each relationship manager must also undergo mandatory training on the MiFID 2 and a product training in the e-learning form. The product training describes detailed characteristics of a given product and clearly points to the risks associated with investments in a given product or financial instrument. If the relationship manager does not have the required level of experience or knowledge, he/she works under the supervision of the so-called authorized employee who regularly verifies his/her work.

If the law or internal regulations governing investment products change, **e-learning refresher training is made available** to relationship managers. As a result, the employees have adequate and current knowledge of the investment products offered. Additionally, relationship managers take advantage of regular market and product conference calls. The Bank's employees also have permanent access to current product presentations.

[GRI 2-27] In 2023 no penalties were imposed on the Bank for non-compliance, nor were there any consumer boycotts concerning the investment products offered by the Bank.

Informing about mortgage products

A customer applying for a mortgage loan, at each stage of the process, receives from the employee full information about the product and the risks associated with it. In 2023, the Bank conducted large-scale online training and webinars on product design and the credit process, reminding how to provide customers with product details in a clear, reliable and transparent way and choose the best offer for them. In 2023, approximately 1,400 mortgage experts were trained in the brokerage network. The training in the form of webinars was aimed at, among others: promotion of innovative solutions supporting customers, both process and product. In 2023, 78 employees of Bank Millennium branches underwent specialist training in mortgage products at various levels of advancement, ending with the "Mortgage Certification". In 2023, two training courses on after-sales service for mortgage loans dedicated to retail chains and one development training dedicated to home construction were launched. The aim of these trainings is to improve the quality of after-sales customer service at the branch and to expand knowledge of the Bank's documentation and credit process. 336 employees took part in these trainings.

[GRI 2-27] In 2023 no penalties were imposed on the Bank in terms of mortgage products being currently offered, nor were there any consumer boycotts.

The legal issues connected with foreign currency loans are described in chapter 3.2.4. "Settlements and other solutions for foreign currency loan borrowers".

Informing about consumer loans

Before the purchase of a product, the Bank investigates the client's needs and helps to establish the client's financial standing and thus adjust the manner of communication and offer a suitable product. The risk of over-indebtedness and household budget mismanagement is minimized owing to advanced methods of assessing clients' creditworthiness and capabilities used by the Bank. The Bank may offer to its clients the opportunity to consolidate the debt repaid to other lenders, which often allows them to reduce their monthly credit charges in the household budget and improve their financial security.

[GRI 2-27] In 2023 no penalties were imposed on the Bank in terms of consumer loans, nor were there any consumer boycotts.

Informing about insurance products

Information regarding insurance products is presented by the Bank in a manner customized to the sales channel for a given product, orally or at the various stages of the sales process in remote channels. This information is also set forth in the insurance documentation and/or banking documentation of the bank product to which the insurance is offered. The Bank takes into

consideration the aspect of customizing insurance to clients' needs and expectations in the process of offering insurance.

Insurance documentation contains standardized specific provisions regarding insurance stemming from the regulations of law, the Insurance Distribution Act and the guidelines set forth in Recommendation U that provide for transparently presenting products to clients.

The Bank employs the rules of ethical sales of products by providing for standards consistent with the guidelines set forth in Recommendation U concerning best practices in bancassurance and the Insurance Distribution Act.

The Bank educates its employees to procure the appropriate level of quality in the process of selling insurance products. On top of product training sessions ending with an exam to confer authorization to commence the sales of insurance, Bank employees go through annual professional training sessions to enhance their competences systematically in terms of performing tasks involving insurance intermediation services. Besides legal issues much attention during training sessions is devoted to the general rules and practical aspects of distribution activity.

[GRI 2-27] In 2023 no penalties were imposed on the Bank in terms of insurance products, nor were there any consumer boycotts.

3.2.3. ETHICAL STANDARDS IN CLIENT SERVICE

[GRI 3-3, FS15] Activities concerning ethical sales place strong emphasis on service being compliant with the regulatory requirements and fulfilling the following assumptions:

- Tools and guidelines in call scripts focused on giving clients the best possible service by conveying full and precise information on various products and processes;
- Call scripts refer to the necessity of vetting client needs and analyzing products in terms of their expectations and circumstances;
- Assumptions and tools concerning product models are subject to verification by the compliance unit.

Implementing sales standards in sales units (including ethical sales) is achieved under the following: preliminary training, e-learning training and post-implementation activities by the persons and units appointed to do that (including bosses).

The guidelines set forth in the **Book of Client Service Standards** obligate employees to do the following in particular: analyze client needs, present the Bank's offering clearly, discuss the rules on how the product works, present cost information, diagnose client doubts, provide explanations and ultimately - confirm that the rules on how the product works are comprehensible to the client prior to signing an agreement.

At the Bank Millennium Group, ethical sale of products is regulated not only in such guidelines as the **Code of Ethics, Book of Standards or other internal procedures**. Attaching great importance to quality and a high level of ethics in sales, the Bank also prepared **Client Call Scripts** about daily banking products, credit products and savings and investment solutions. These scripts have been in operation for several years and are updated and optimized successively. Each implementation of a new script involves a mass implementation of the solution among direct customer service employees and training sessions. All the changes made to the scripts centre on ensuring complete transparency in terms of the information provided and client education so that they can benefit from the services offered by the Bank with full awareness.

Compliance with the Scripts and Client Service Standards is constantly monitored by a unit specially set up for this purpose, while the results are conveyed to the Bank's Management Board and the direct superiors of the employees subject to evaluation and are used to take remedial efforts

across the Bank. Compliance with sales standards and ethics is also monitored independently of the Bank by using various types of service quality rankings. The Bank attaches great importance to them and takes into account all the conclusions drawn from them.

The above-mentioned policies are internal documents, while the Code of Ethics is available on the Bank's website:

https://www.bankmillennium.pl/documents/10184/84940/Kodeks_Etyczny.pdf/8bcf7e70-8f59-4cf2-9f3a-c80074e15991?t=1705481424367

In terms of insurance products, the Bank employs standards consistent with the guidelines set forth in Recommendation U concerning best practices in bancassurance and the Insurance Distribution Act.

Collection policy

The receivables are restructured and collected by organizational units in the Bank that have been established especially for this purpose. There are separate units dealing with receivables from corporate and retail clients (including Biznes clients, too) based on internal (instructions, communications and guidelines) and external regulations (in particular, based on the norms of generally applicable national and EU law).

In the area of retail debt recovery, the Bank hires employees with expanded knowledge of both law, economics or related fields, as well as experience in the area of negotiations and discussions with customers. Employees' knowledge is regularly updated through training related to, among other things, new legal or technical solutions implemented.

The goal of the activities of all dedicated units is to find the best solution for both parties, allowing the client to get out of the payment crisis or, if the above proves impossible, to satisfy the receivables to the Bank as soon as possible.

In the course of recovering retail receivables, the Bank is guided by the principle of:

- legalism - any action taken to satisfy the Bank's receivables must be justified in the applicable legal system, without violating the applicable laws,
- personalized approach - each case requires individual recognition and the application of methods and measures appropriate to the facts,
- amicability - in each case, the first thing to do is to reach an agreement with the customer on the terms of debt repayment
- comprehensiveness of the case analysis - both the initial action strategy and its modifications should be based on a comprehensive analysis of the case, made on the basis of the data, files and other information held and updated during the course of the proceedings,
- innovation - during the process of recovering past due receivables, the Bank pays special attention to the development of new methods, instruments and approaches used.

The process of pursuing receivables from retail clients is conducted while using a supporting IT system linked to the Bank's operating system and the credit card administrative system making it possible to identify receivables at risk, verify and monitor them, archive actions, progress and the outcomes of collection, dispatch key correspondence and report and manage various receivables.

With regard to the process of recovering retail receivables, the Bank has instructions and guidelines that specify how to conduct telephone conversations focused on respect for the customer and efforts to reach an amicable solution to non-payment.

In addition, the Bank attaches great importance to the legibility and clarity of letters addressed to customers - the "Plain Language" declaration was implemented, as a result of which a standard for plain communication was built. Training courses on the subject have also been organized with plain language consultants, with several hundred people from many areas of the Bank participating.

Provisions regarding a transparent debt collection process are also regulated in selected provisions of the product regulations, which are made available to customers in the process of concluding contracts and on the Bank's website.

Assistance in repayment of debt

Bank Millennium offers a debt consolidation loan with an option to pay down debt in other banks to clients who are looking for an opportunity to reduce the costs of servicing their current liabilities. In addition, **clients may take advantage of a deferred payment of one installment of a cash or consolidation loan** (credit holidays), which represents important help in a case in which the funds designated for an installment in a given month must be used for other purposes.

In the case of loan defaults or the customer reporting potential repayment problems, the Bank offers customers the possibility to negotiate to establish new mutually convenient payment terms. The conclusion of an annex or restructuring agreement containing in its content, modifications to the existing terms and conditions of repayment of the liabilities, adapted to the customer's situation and financial capabilities, is possible in any form - both during a visit to the Bank's facilities and using electronic banking channels (online). The Bank offers customers a wide range of possible restructuring solutions, including, in particular, reducing the amount of installments paid, extending the term of the loan, changing the payment date. A number of online solutions are also deployed in the retail area, allowing the customer to initiate self-help activities. Depending on the customer's situation, the Bank allows and offers individual groups of customers the possibility of, among other things, changing the repayment schedule on their own (online).

3.2.4. SETTLEMENTS AND OTHER SOLUTIONS FOR FOREIGN CURRENCY MORTGAGE LOAN BORROWERS

For many years, Bank Millennium has been consistently following the strategy of seeking and implementing amicable solutions to resolve problems related to FX mortgage loans (in particular those indexed to or denominated in CHF). The solutions offered to clients are customized to their needs and are aimed at, among others, making it easier for borrowers who repay a CHF loan to convert the loan currency (i.e. change the repayment currency to Polish zloty) or repay the loan on favorable terms. The Bank makes efforts to limit the formalities associated with these orders to the necessary minimum and to make sure that the offer is suitable for the client's current circumstances.

The negotiation process is addressed to all clients with outstanding loan agreements in CHF. Its scope includes the clients who are litigating and those who are not. This division allows the Bank to apply the procedures and tools that are adequate to the client's actual situation. Special attention is given to clients in difficult life or financial circumstances (clients with significant amount of past due payments). Each group of clients receives an offer tailored to their individual situation and needs, while the terms and conditions offered to the last group (customers in difficult life or financial situation) sometimes being more favorable due to the specific situation of the borrowers (illness, long-term unemployment/difficult financial situation, death of one of the borrowers, divorce).

Bank Millennium is one of the first banks to have made it possible for foreign currency loan borrowers to enter into settlements on a significant scale. In 2020-2023, as a result of this process, the number of outstanding mortgage loans in CHF decreased by 21,428 (out of which in 2023 alone the number of settlements was 3,672). In 2024, the Bank will continue its activities aimed at reducing the foreign currency loan portfolio.

One must also remember that since 5 May 2020, orders given by clients with mortgage loans indexed to or denominated in Swiss francs (including repayment of loan instalments), have been fulfilled by Bank Millennium using the exchange rate equal to the average exchange rate of the National Bank of Poland for Swiss francs published in Table A - Average foreign currency exchange rates.

Since January 2015, when quick increase of the Swiss franc exchange rate was recorded, Bank Millennium has been offering special solutions comprising the so-called “six-pack”, including:

- (1) Accepting a negative LIBOR rate for calculating the interest rate for mortgage loans.
- (2) A significant reduction of the so-called exchange rate spread, which causes a perceivable decrease in the level of loan instalments paid by clients (replaced by the NBP average exchange rate in 2020)
- (3) At a client’s request, extension of the repayment term or temporary suspension of loan instalment repayment so that the instalment amount is not higher or is only slightly higher than before the exchange rate was freed. Such requests were only available to the borrowers residing in the financed property.
- (4) Resignation from demanding new collateral and loan insurance from borrowers who repay loan instalments on a timely basis.
- (5) Allowing borrowers to convert the loan currency from CHF to PLN at the exchange rate equal to the average exchange rate published by the NBP (standard offer).
- (6) Making the rules for mortgage loan restructuring more flexible for clients residing in the financed properties.

The borrowers who are Bank Millennium clients may also receive aid from the Borrower Support Fund designed for the individuals, who experience financial hardships and are obligated to make repayments of mortgage loan instalments (irrespective of the loan currency) constituting a substantial burden on the household budget.

A borrower who has been awarded such support will receive monthly funds to cover the repayment of a loan instalment. The funds are paid for a period no longer than 36 months in the amount corresponding to the loan instalment amount, but no more than PLN 2,000. If the amount obtained from the sale of the real property is not sufficient for full repayment of the mortgage loan, a borrower may receive a debt repayment loan (zero-interest form of aid) in the maximum amount of PLN 72,000. Repayment of the aid received begins two years after the last part of the support or debt repayment loan is paid out and is divided into 144 instalments with no interest. A portion of the amount may be forgiven, provided that repayments are made on a timely basis.

As at 31 December 2023, the Bank had 20,729 loan agreements and additionally 1,756 loan agreements from the former Euro Bank that were the subject matter of currently pending individual lawsuits (these figures do not include collection cases) relating to indexation clauses in FX mortgage loans submitted to courts (64% of the loan agreements before first instance courts and 36% of the loan agreements before second instance courts).

The Bank is a party to a class action lawsuit initiated in 2014 seeking to establish the Bank’s liability for unjust enrichment in connection with the concluded foreign currency mortgage loan agreements. This is not a lawsuit seeking any payment. A ruling in these proceedings will not award any amounts to the members of the group. There are 3,273 loan agreements included in these proceedings. At this stage, the composition of the group has been established and confirmed by the court. The proceedings have entered the phase of examining the merits. In the meantime, more than 26% of the loan agreements in this class action have been the subject of an arrangement (pertaining to conversion to PLN or early repayment) between the Bank and the borrower through the aforementioned settlement process.

More information on foreign currency mortgage loans legal risk can be found on the Annual Consolidated Financial Report of the Bank Millennium S.A. Capital Group for the 12-month period ending 31st December 2023.

RESPONSIBLE EMPLOYER

Bank Millennium creates a friendly work environment for all staff regardless of their gender, age, race, religion, nationality, ethnic origin, disability, political beliefs, trade union membership or sexual orientation, so that everyone may thrive in conditions conducive to professional development in an atmosphere of cooperation and mutual respect. In 2022 Bank Millennium received a number of awards:

Ranked 2nd in the Best Employers Poland 2023 ranking in the “Banks and financial services” category

Bank Millennium came second again in the ranking of best employers in the banking and financial sector and 44th overall among all the companies included in the Best Employers Poland 2022 ranking. The ranking of 300 companies operating in Poland that conduct successful HR operations has been compiled by Forbes Poland and Statista.

Golden CSR Leaf

Bank Millennium’s sustainability efforts and the fact that they have been integrated in its business strategy have once again been recognized with the Golden CSR Leaf awarded by the Polityka weekly. It is awarded to companies that implement the highest standards of social responsibility - they have ethics management systems in place, they engage socially, take action in response to the needs of their customers and employees and minimize their environmental footprint.

Millennium awarded for its diversity activities

Bank Millennium was included in this year’s Financial Times Diversity Leaders Ranking. This list of European companies is prepared periodically by the elite economic and financial daily in cooperation with the research company Statista. The “European Diversity Leaders 2024” ranking presents a list of 850 companies that obtained the highest points in the survey. Bank Millennium was ranked 262nd on the list, achieving an index of 73.36 points. Bank Millennium has the sixth position in the ranking among Polish companies, but we are the best in the domestic banking sector.

Bank Millennium with the Sound Employer 2023 title

In 2023, Bank Millennium was honored with the title of Solid Employer of the Year for the tenth time in a row. The award is granted to companies that care about safety, working conditions and employee development.

The aim of the Solid Employer of the Year program is to select the best employers in Poland, business entities with an exemplary personnel policy, which translates into high quality of products and services provided on the demanding Polish market. The Solid Employer of the Year program, organized by the Kowalski Pro-Media group, is one of the oldest projects of this type in Poland.

3.3. HEADCOUNT STRUCTURE

At the end of 2023 the headcount in the Bank Millennium Group was 6,872 people. Most of the employed workers were women (66%), and the average age of employees was 39. The overall monthly fluctuation rate declined from the previous year and stood at 3%. The Bank treats the Republic of Poland as the area of its business activity, therefore all disclosures in the ESG Report refer to Poland, and the Bank does not distinguish other locations important from the perspective of business activity.

In the Bank Millennium Group, we did not record any significant fluctuations in the number of Group employees between reporting periods. We do not employ employees with non-guaranteed working hours.

[GRI 2-7] Number of employees in 2023*

	Men				Women				Grand total
	<30 yrs	30-50 yrs	>50 yrs	Total men	<30 yrs	30-50 yrs	>50 yrs	Total women	
Bank Millennium Group	514	1,493	359	2,366	916	3,000	590	4,506	6,872
Bank Millennium	501	1,393	317	2,211	891	2,844	539	4,274	6,485

* Employment status in persons as of 31.12.2023

[GRI 2-7] Employees by type of employment in 2023*

	Bank Millennium Group			Bank Millennium		
	Men	Women	Total	Men	Women	Total
Full-time	2,309	4,363	6,672	2,196	4,201	6,397
Part-time	57	143	200	15	73	88
Employment agreement	2,366	4,506	6,872	2,211	4,274	6,485
For an indefinite term	1,997	3,850	5,847	1,857	3,630	5,487
For a definite term	369	656	1,025	354	644	998

* Employment status in persons as of 31.12.2023

[GRI 401-1] Newly-hired employees*

	Men			Total men	Women			Total women	Grand total
	<30y rs	30-50 yrs	>50 yrs		<30y rs	30- 50yrs	>50y rs		
Bank Millennium Group (percentage in a given age category)	222 (37%)	169 (39%)	15 (47%)	406 (38%)	385 (63%)	259 (61%)	17 (53%)	661 (62%)	1,067 (16%)
Bank Millennium (percentage in a given age category)	217 (37%)	148 (39%)	12 (48%)	377 (38%)	375 (63%)	233 (61%)	13 (52%)	621 (62%)	998 (15%)

*Number of persons hired during the year 2023. The percentages in the "Grand total" column mean the percentage of newly employed employees in the Millennium Group/Bank in the total number of employees in the Millennium Group/Bank as at December 31, 2023

[GRI 401-1] Departures - number of employees*

	Men			Total men	Women			Total women	Grand total
	<30 yrs	30-50 yrs	>50 yrs		<30 yrs	30-50 yrs	>50 yrs		
Bank Millennium Group (percentage in a given age category)	190 (38%)	199 (32%)	29 (35%)	418 (35%)	316 (62%)	417 (68%)	53 (65%)	786 (65%)	1,204 (18%)
Bank Millennium (percentage in a given age category)	186 (37%)	183 (32%)	22 (32%)	391 (34%)	311 (63%)	387 (68%)	47 (68%)	745 (66%)	1,136 (18%)

* The number of persons who left the organization during the year 2023. The percentages in the "Grand total" column mean the percentage of employees who left the Millennium Group/Bank in the total number of employees in the Millennium Group/Bank as at December 31, 2023

Employee turnover ratio*

	Men				Total men	Women				Grand total
	<30 yrs	30-50 yrs	>50 yrs			<30 yrs	30-50 yrs	>50 yrs	Total women	
Bank Millennium Group	7%	2%	1%	3%		6%	2%	1%	3%	3%
Bank Millennium	7%	2%	1%	3%		6%	2%	1%	3%	3%

* Sum of new hires and departures in a given year divided by year-end headcount multiplied by 12 for each age group and by gender (in persons)

Employees hired locally*

	Bank Millennium Group			Bank Millennium		
	Men	Women	Total	Men	Women	Total
Number (and percentage) of employees	2,345 (99%)	4,484 (100%)	6 829 (99%)	2,191 (99%)	4,254 (100%)	6,445 (99%)
Number (and percentage) of Management Board Members and senior managers	60 (90%)	27 (100%)	87 (93%)	49 (88%)	23 (100%)	72 (91%)

* Polish citizens working in Poland (employment status as of 31.12.2023)

[GRI 405-1] Employees by position and age/gender

Bank Millennium Group *	Men				Total men	Women				Grand total
	<30 yrs	30-50 yrs	>50 yrs			<30 yrs	30-50 yrs	>50 yrs	Total women	
Management Board	0	0	7	7		0	0	0	0	7
Senior management	0	24	36	60		0	14	13	27	87
Management	15	311	79	405		12	408	101	521	926
Sales personnel	361	501	52	914		763	1,691	218	2,672	3,586
Technicians	108	589	169	866		85	718	243	1,046	1,912
Other employees	30	68	16	114		56	169	15	240	354
Total	514	1,493	359	2,366		916	3,000	590	4,506	6,872

* Employment status in persons as of 31.12.2023

Bank Millennium *	Men				Total men	Women				Grand total
	<30 yrs	30-50 yrs	>50 yrs			<30 yrs	30-50 yrs	>50 yrs	Total women	
Management Board	0	0	7	7	0	0	0	0	7	
Senior management	0	22	27	49	0	11	12	23	72	
Management	15	298	71	384	12	377	86	475	859	
Sales personnel	360	484	46	890	760	1,673	214	2,647	3,537	
Technicians	97	535	152	784	70	644	216	930	1,714	
Other employees	29	54	14	97	49	139	11	199	296	
Total	501	1,393	317	2,211	891	2,844	539	4,274	6,485	

* Employment status in persons as of 31.12.2023

[GRI 405-1] Employees by gender

Bank Millennium Group *	Men	%	Women	%	Total	%
Management Board	7	100%	0	0%	7	100%
Senior management	60	69%	27	31%	87	100%
Management	405	44%	521	56%	926	100%
Sales personnel	914	25%	2,672	75%	3,586	100%
Technicians	866	45%	1,046	55%	1,912	100%
Other employees	114	32%	240	68%	354	100%
Total	2,366	34%	4,506	66%	6,872	100%

* Employment status in persons as of 31.12.2023

Bank Millennium *	Men	%	Women	%	Total	%
Management Board	7	100%	0	0%	7	100%
Senior management	49	68%	23	32%	72	100%
Management	384	45%	475	55%	859	100%
Sales personnel	890	25%	2,647	75%	3,537	100%
Technicians	784	46%	930	54%	1,714	100%
Other employees	97	33%	199	67%	296	100%
Total	2,211	34%	4,274	66%	6,485	100%

* Employment status in persons as of 31.12.2023

[GRI 405-1] Employees by age

Bank Millennium Group *	<30 yrs	%	30-50 yrs	%	>50 yrs	%	Total	%
Management Board	0	0%	0	0%	7	100%	7	100%
Senior management	0	0%	38	44%	49	56%	87	100%
Management	27	3%	719	78%	180	19%	926	100%
Sales personnel	1,124	31%	2,192	61%	270	8%	3,586	100%
Technicians	193	10%	1,307	68%	412	22%	1,912	100%
Other employees	86	24%	237	67%	31	9%	354	100%
Total	1,430	21%	4,493	65%	949	14%	6,872	100%

* Employment status in persons as of 31.12.2023

Bank Millennium *	<30 yrs	%	30-50 yrs	%	>50 yrs	%	Total	%
Management Board	0	0%	0	0%	7	100%	7	100%
Senior management	0	0%	33	46%	39	54%	72	100%
Management	27	3%	675	79%	157	18%	859	100%
Sales personnel	1,120	32%	2,157	61%	260	7%	3,537	100%
Technicians	167	10%	1,179	69%	368	21%	1,714	100%
Other employees	78	26%	193	65%	25	8%	296	100%
Total	1,392	21%	4,237	65%	856	13%	6,485	100%

* Employment status in persons as of 31.12.2023

[GRI 2-8]As at 31.12.2023, the Bank cooperated with 579 non-employees. This group includes mainly 194 persons who were contractual employees providing highly specialized IT services in development projects of the Bank. The vast majority of the other individuals were 222 individuals working for Millennium Leasing in sales network as external partners.

3.4. WORKING CONDITIONS

3.4.1. HR POLICY

[GRI 3-3] The Bank Millennium Group has in place the “**Bank Millennium Group’s Human Resource Policy**” concerning such issues as employee recruitment, management, development and retention as well as planning and monitoring employment.

The Bank has compensation policies in place for employees as well as persons having material impact on the Bank’s risk profile. They formulate the assumptions used to shape the fixed and variable components of these employees’ compensation.

Bank Millennium operates in compliance with the policies for selection and assessment of Supervisory Board Members and Management Board Members as well as key functions holders. The application of these policies ensures that the persons discharging the most important functions in the Bank Millennium Group, including functions in the management bodies, have the requisite professional qualifications and the appropriate reputation. This policy fosters sound Group management, the generation of stable results and the appropriate risk management in the long-term perspective.

Another policy in force is “**Diversity Policy**”, which shows that Bank Millennium operates while respecting human dignity and the right of equal treatment regardless of age, gender, ethnic or national origin, religion, creed, family status, sexual orientation, health condition, convictions, trade union membership and other premises that could trigger discrimination.

The Bank Millennium Group applies employee regulations that are as uniform as possible, in particular: **Work Rules and Regulations** - laying down the organization and order of work and the related rights and duties of the employer and employees as well as **Compensation Rules and Regulations** establishing the rules and conditions for paying compensation and awarding other benefits.

The result of applying HR policies is as follows:

- Creating uniform rules of employment, access to benefits and compensation;
- Checking compensation systems periodically, including base salaries, including comparisons with market benchmarks;
- Using balanced appraisal systems aligned to the mid and long-term targets while taking into account quantitative and qualitative criteria;
- Checking qualifications and conscientiously selecting employees for the top positions in the Group;
- Countering conflicts of interest and decision making that poses a threat to the Bank’s long-term interests by introducing more detailed criteria for appraising the work of people in managerial positions referring to their impact on the risk;
- Counteracting discrimination and mobbing through communication, training and implementing an abuse reporting system;
- Building an organizational culture based on values by extensively advancing organizational values.

3.4.2. COMPENSATION POLICIES

The Bank Millennium Group has in place a uniform “**Compensation Policy for employees of the Bank Millennium Group**”, which articulates the assumptions used to shape the fixed and variable components of compensation for all the Group employees. The policy aims to provide a formal framework for shaping the practice of compensating all the Group’s employees from the perspective of corporate governance, institutional safety and the adequacy of compensation to the Group’s standing, scale of operations and growth potential.

Furthermore, for employees identified as having material impact on the risk profile (the so-called Risk Takers), there is “**Compensation Policy for Risk Takers in the Bank Millennium Group**”, which specifies detailed rules for granting variable components of compensation and other terms and conditions affecting the decisions on their payment. In addition, Bank Millennium has in place the “**Instruction for identification of employees whose professional activities have material impact on the risk profile (Risk Takers) at the Bank Millennium Group**” which includes guidelines for the annual Risk Takers identification process.

In the **Millennium Towarzystwo Funduszy Inwestycyjnych SA** subsidiary, in accordance with the statutory obligation, a separate compensation policy is in place and the solutions comprised therein are contained in the framework adopted in the “**Compensation Policy of the Bank Millennium Group**”.

The adopted policies form a framework for organizing principles of compensation in key aspects:

- principles for defining the amounts of compensation,
- the relationship of variable compensation to fixed compensation,
- decision-making process for changing compensation,
- supervision of all the compensation decisions at the Bank and in the Group,
- linking bonuses to good results of both the company and the employee,
- counteracting incentives that induce actions and decisions that threaten the long-term interest of the Bank and its clients,
- defining assessment criteria corresponding to short-, medium- and long-term goals set for employees,
- taking into account additional qualitative criteria for assessing work in units where work is especially directed to sales results.

The Bank consistently uses stable forms of employment and compensation. Employees have employment contracts and fixed compensation makes up a major part of their overall compensation. The policy defines the framework to determine fixed compensation of employees, taking into consideration the tasks and competences required in individual teams and units. The assumed compensation levels at individual grades and positions are verified based on the market situation and data from reports on compensation levels in business sectors.

The Bank constantly monitors the solutions adopted in individual business lines so that they do not create stimuli for actions and decisions that threaten the long-term goals of the Bank, exceed the accepted risk profile, and do not encourage actions that are inconsistent with the best interests of the Group’s clients and investors.

Process to develop compensation policies and determine remuneration

[GRI 2-20] The Bank has in place the “Compensation Policy for employees in the Bank Millennium Group”, which was drawn up while taking into account the management and internal control system in place, as well as the “Compensation Policy for Risk Takers in the Bank Millennium Group”.

The Bank’s Management Board is responsible for the implementation of the Compensation Policies. The Bank’s Management Board develops, implements, maintains and ensures the operation of the Compensation Policies that are suitable for the management system and risk strategy and the internal control system in the Bank Millennium Group.

The Bank’s Supervisory Board is responsible for the approval and maintenance of the Compensation Policies. Once a year, the Bank’s Supervisory Board prepares and presents to the Bank’s Shareholder Meeting a report on the assessment of the functioning of Compensation Policies in the Bank Millennium Group.

The implementation of the Compensation Policies in the Bank Millennium Group is subject opinions by the Personnel Committee of the Bank’s Supervisory Board. In its report to the Bank’s Supervisory Board, the Personnel Committee of the Bank’s Supervisory Board presents its conclusions regarding the functioning of the Compensation Policies.

The Bank’s Shareholder Meeting is responsible for assessing whether the approved Bank Millennium Group Compensation Policies support growth and security. The Bank’s Shareholder Meeting makes the above assessment on the basis of the annual report on the assessment of the functioning of the Compensation Policies in the Bank Millennium Group, which is prepared and presented by the Bank’s Supervisory Board.

The Trade Unions active in Bank Millennium provide consultation of any changes that are introduced to the rules governing basic salary and to bonus systems.

The process to determine remuneration is defined in the “Rules and Regulations for Compensating Employees of the Bank Millennium S.A.’s Head Office”. These rules and regulations set the terms and conditions of compensation, including the minimum levels of basic salary resulting from the assigned grade and position.

At the Bank, regular salary and position reviews are conducted. Pursuant to an assessment of the Group’s financial condition and its business environment, the Bank’s Management Board may make a decision to award a pool of funds to be used to modify employees’ base salaries. Salary levels are reviewed taking into account the periodic assessment of performance and skills and are compared with salary information presented in salary studies on the financial markets.

The compensation of senior managers is set by the Personnel Committee of the Bank’s Management Board and the compensation of the Bank’s Management Board Members is determined by the Personnel Committee of the Bank’s Supervisory Board.

External consultants are not directly involved in the process to determine compensation levels, however the Bank does analyze data from compensation reports provided by consultants from Korn Ferry and Sedlak&Sedlak.

Policy of variable compensation components

In the Bank Millennium Group, variable compensation is an additional motivational part of the overall compensation, shaped using differentiated bonus schemes whose purpose is to motivate employees to achieve their business and organizational plans. The bonus systems and periodic evaluation criteria in the Bank Millennium Group have been adapted to the specific nature of work performed by employees in the Group’s various areas. The rules for granting bonuses are defined for individual

employee groups in the Rules and regulations of performance assessment and conditions for granting bonuses.

The Bank does its best for the motivation mechanisms addressed to the employees of sales units and other units involved in processes related to client service to be devised in such a way that they do not lead to a conflict of interest or incentives that may incline Group employees to place their own interests or the firm's interest first thereby creating a prospective loss for any Group client.

The bonus pool amount depends each time on overall results and on the general condition of the Bank. Bonuses are paid out monthly or semi-annually in the Bank's sales network and other head office units involved in the customer service of retail clients or quarterly for employees of the Bank's Head Office.

The bank linked a variable part of the remuneration of people holding key positions (implementing strategic ESG initiatives) with the qualitative assessment and the degree of implementation of strategic ESG initiatives.

[GRI 2-19] The rules for compensating members of the highest governance bodies are set forth in the "Compensation Policy for Bank Millennium S.A. Management Board and Supervisory Board Members". Senior management in the Bank Millennium Group is comprised of employees identified as having material impact on the Group's risk profile, or Risk Takers. They are subject to the provisions of the "Compensation Policy for Risk Takers in the Bank Millennium Group". The policy aims to provide a formal framework for determining the compensation of all the Group's employees from the perspective of corporate governance, institutional safety and the suitability of compensation to the Group's standing, scale of operation and growth potential, by defining fixed and variable compensation elements.

As defined in the Policy, compensation includes all forms of benefits, financial and non-financial payments, provided directly and indirectly to Management Board Members, Supervisory Board Members and Risk Takers in the Bank Millennium Group.

Compensation may consist of fixed and variable components.

Fixed compensation should reflect professional experience and responsibility within the organization, while taking into account:

- the level of education, work experience, professional expertise and skills relevant to the role performed in the organization,
- complexity of tasks and impact on the institution's risk profile, as well as constraints (e.g. social, economic, cultural or other relevant factors),
- scale of operations and level of compensation on similar positions in institutions with a similar profile and scale of operations as the Bank.

Variable compensation is an additional, motivational element of compensation and the ratio of variable compensation to fixed compensation should not exceed 100% over a year. In justified cases, with the approval of the Bank's Shareholder Meeting, this ratio may be increased, but not above 200%.

In order to prevent conflicts of interest, Supervisory Board Members receive fixed compensation only, paid out in cash. The compensation of Supervisory Board Members is not linked to the Bank's financial and business performance.

The compensation may be differentiated by taking into account the function performed on the Supervisory Board or the work in committees, and it should also be correlated with the involvement in the work of the Supervisory Board and the level of compensation received by members of supervisory bodies of institutions with a similar scope and scale of operations.

Management Board Members and Risk Takers may receive fixed and variable compensation elements. Based on the policy requirements, 50% of the variable compensation is awarded in the form of financial instruments. Additionally, 50% of the bonuses for Management Board Members and 40% of the bonuses for Risk Takers is deferred to be paid out over the following 5 years. If annual variable compensation drops below a certain limit, the entire bonus amount may be paid out in cash without engaging the deferral mechanism.

The Bank takes into account the ESG aspect in its assessment of the quality of its Management Staff. When determining the variable remuneration of risk takers who implement the ESG Strategy, one of the evaluation criteria is the degree of implementation of ESG Strategy initiatives. The principles of compensation for members of the highest governance bodies are designed in such a way as to avoid creating any stimuli that could incline people to engage in activities and take decisions that pose a threat to the Bank's long-term welfare and transcend the acceptable risk profile, to undertake actions at odds with the best interests of the Group's clients and investors and to introduce risks to sustainable development in the activity of Group companies. Additionally, the compensation principles are designed to uphold neutrality in reference to gender.

No external consultants were involved in the process to determine compensation for members of governance bodies.

[GRI 2-20] In 2023, the Shareholder Meeting accepted the "Report on compensation of Bank Millennium Management Board and Supervisory Board Members for 2022".

Annual compensation ratio

[GRI 2-21] The ratio of the 2023 annual total compensation of the highest paid individual in the organization to the median of annual total compensation of all employees (excluding the highest paid individual) equals to 40.

The ratio of the percentage increase in the total annual compensation for 2023 of the highest paid individual in the organization to the median of percentage increase in the total annual compensation for all employees (excluding the highest paid individual) is 1.42. From January 1, 2024, a remuneration review took place related to the introduction of a new model of positions and grade levels, which will significantly affect the increase in the median of remuneration in the next year.

For the purpose of calculating the above ratios, it has been concluded that the total remuneration includes the base salary, benefits and variable remuneration paid by Bank Millennium in 2023 (including blocked rights to financial instruments), while it excludes benefits related to relocation to the country where the work is performed.

3.4.3. SIGNIFICANT RISKS RELATED TO THE EMPLOYEE AREA

A significant risk factor is the **employee turnover ratio and the prospective loss of competences of importance to the Bank's development**. Shortages of employees having specific competences in the labour market and competition for acquiring specialized employees may cause a periodic risk of making decisions to recruit employees and compensate them at higher rates than those prevailing in the organization. As a result, there may appear compensation disparities between similar positions. The Bank takes actions to prevent that undesirable phenomenon, especially by setting recommended recruitment compensation levels and performing periodic compensation reviews.

Another risk associated with the compensation policy may be the applied motivation mechanisms inclining employees to work in a task-based manner which may potentially cause a conflict of interest. The risk of employees acting too one-sidedly as a result of incentive mechanisms aimed at achieving higher sales, and therefore bonuses, is mitigated by taking into account quality criteria when evaluating work.

In addition, the consistent implementation of the adopted Compensation Policy allows for minimizing risks by, among others, maintenance of the right ratio of fixed to variable compensation, application of a formal assessment system including criteria adjusted to the nature and special character of work and a long-term perspective for assessing business results, the mechanism of managing the variable compensation pool dependent on the Bank’s financial standing.

3.4.4. SUPPORTING DIVERSITY AND COUNTERACTING DISCRIMINATION

In accordance with the "Human Resources Policy" in force in the Bank Millennium Group the use of any discriminatory practices with features of mobbing or harassment in relation to employees is prohibited. The Bank Millennium Group operates while respecting human dignity, it adheres to the law on equal treatment regardless of age, gender, ethnic or national origin, religion, creed, family status, sexual orientation, health condition, convictions, trade union membership and other premises that could trigger discrimination. The Bank has "Diversity Policy" and is a signatory to the **Diversity Charter**, which is a pledge signed by organizations that choose to prohibit discrimination in the workplace and work to create and promote diversity.

Issues of human rights, including respect for diversity in the Bank’s Group are also governed by the "Code of Ethics", the "Diversity Principles", the "Work Rules and Regulations" and regulations pertaining to recruitment. The result of implementing these policies is a series of measures. All employees go through mandatory training on ethical issues, which include human rights. In addition, the management is trained on combating mobbing and discrimination in employment. **The Bank has anti-mobbing and anti-discriminatory procedures.** Employees may report abuse anonymously to the stated email address.

	Bank Millennium				Bank Millennium Group			
	2023	2022	2021	2020	2023	2022	2021	2020
Number and % of managers trained on anti-discrimination and mobbing in a given year	204	169	29	98	209	182	31	102
	22%	18%	3%	10%	21%	18%	3%	9%
Total percentage of trained managers	88.79%	72.94%	61.45%	61.83%	89.02%	74.07%	62.08%	63.26%

* The data do not include employees of franchised branches.

- **During employee recruitment, criteria putting one in jeopardy of discriminatory behavior are not applied.** These rules also apply to the termination of employment, terms of employment, promotions and access to training to raise professional qualification. Candidates are selected based on objective criteria, such as in particular: education, professional experience, general and specific competences, proficiency in foreign languages and the overall match with the profile.
- The Bank analyzes on an ongoing basis the compensation structure and **equality of earnings** and jobs by gender, age and nationality. Interviews are held from time to time with persons leaving the Bank to grasp the reasons for them to leave.
- Extensive communication and support are addressed to employees who are parents. The Bank advises them of their parental rights in the **Yes to Parenting** program.
- **Benefits such as medical care, group insurance, co-financing for sport and recreation** are offered to all employees, also part-time employees. The Bank encourages employees to take their holiday leaves.
- **The Bank lends a helping hand to people in a challenging** financial and health-related situation through the existing social assistance system predicated on the Company Social Benefits Fund.
- **People with disabilities** may take advantage of office infrastructure that is adjusted to their capabilities.

	Bank Millennium Group				Bank Millennium			
	2023	2022	2021	2020	2023	2022	2021	2020
[GRI 405-1] Employees with disabilities	64 (0.93%)	66 (0.94%)	69 (0.97%)	68 (0.89%)	64 (0.99%)	65 (0.98%)	67 (1.01%)	66 (0.92%)

[GRI 405-1] Employees with disabilities by age and gender*

	Men				Total men	Women				Grand total
	< 30 yrs	30-50 yrs	> 50 yrs	Total men		< 30 yrs	30-50 yrs	> 50 yrs	Total women	
Bank Millennium Group	1.17%	0.74%	1.67%	0.97%	0.33%	0.80%	2.37%	0.91%	0.93%	
Bank Millennium	1.20%	0.79%	1.89%	1.04%	0.34%	0.84%	2.60%	0.96%	0.99%	

* Headcount as at 31 December 2023

- The Bank runs **management training** whose aim is to strengthen appropriate attitudes, including also to overcome stereotypes and promote openness to employees' various convictions and mold their own responsibility and that of their reports.
- Employees may freely **express their views** on an internal internet forums.

- We have launched the Diversity is OK! initiative to educate employees, promote mutual understanding, raise awareness of the importance of synergy in teams, and build skills to influence the development of teams through effective communication and collaboration among employees. The purpose of the initiative is to demonstrate that differences can unite and bring tangible benefits. We want to make sure that every person in the organization feels important and valued. To reach as many employees as possible, we host regular webinars that can be viewed live or listened to on the Cornerstone training platform. So far, we have covered topics such as gender equality, body positivity, the pay gap, communicating in multigenerational teams, she and he in business - the synergy effect, and feminatives.

The Bank is committed to promoting the idea of leveling the playing field, recognizing different points of view, and developing non-standard solutions for employees and clients.

The HR Department keeps a **register** in which all employee claims are recorded. They are reported to the Process and Operational Risk Committee. A notification is examined using a procedure, which involves, among others: collecting documentation to review the claim, conducting a survey among employees, making a decision to accept or reject the claim and issuing a response to the employee.

[GRI 406-1] In 2023, 19 reports were registered and considered to determine whether they bore signs of mobbing or discrimination. In cases of mobbing, the Bank conducts anti-mobbing surveys and interviews with superiors of teams and units. In all cases that were clarified by December 31, 2023, mobbing was not confirmed. Explanatory proceedings are still ongoing for 3 reports. The conclusions of the findings included tips for managers to pay special attention to the principles of social coexistence and instructions on the need to take care of relationships with employees. In some justified cases, activities developing managerial competences (coaching) were proposed, which could include both managerial tools and building relationships with the team.

If mobbing or discrimination is confirmed, the Bank will implement appropriate actions, including corrective plans, which will be reviewed and verified as part of internal management processes.

The number of reports regarding activities with the characteristics of mobbing or discrimination indicated in this report is higher than the number of such reports for the previous year, because last year only the number of reports regarding activities with the characteristics of mobbing was reported.

The reported indicator **[GRI 406-1]** applies to Bank Millennium Group.

Compensation for women and men

In accordance with the Human Resource Policy in force in Bank Millennium, the Bank incorporates information in the compensation policy concerning the market levels of compensation for similar positions. Employee compensation is periodically checked on the basis of the Bank's current strategy, market data, job performance assessments and employee career stages. The Bank strives to devise bonus schemes in which the incentive is linked to the nature of the work in a given unit - by formulating reasonable and fair ratios describing job performance and the appropriate incentive systems for a given unit in the Bank.

[GRI 405-2] Ratio of women's base compensation to men's

Bank Millennium Group	2023	2022	2021	2020
Senior management	0.88	0.88	0.86	0.83
Management	0.81	0.79	0.75	0.76
Sales personnel	0.94	0.94	0.92	0.91
Technicians	0.74	0.74	0.72	0.74
Other employees	0.93	0.90	0.79	0.79
All employees	0.87	0.87	0.84	0.84

Bank Millennium	2023	2022	2021	2020
Senior management	0.86	0.88	0.87	0.83
Management	0.81	0.78	0.74	0.76
Sales personnel	0.95	0.94	0.92	0.92
Technicians	0.75	0.75	0.73	0.75
Other employees	0.92	0.88	0.76	0.77
All employees	0.87	0.87	0.84	0.85

[GRI 405-2] Ratio of women's total compensation to men's

Bank Millennium Group	2023	2022	2021	2020
Senior management	0.86	0.81	0.78	0.81
Management	0.75	0.74	0.72	0.71
Sales personnel	0.88	0.89	0.85	0.83
Technicians	0.73	0.72	0.73	0.74
Other employees	0.83	0.88	0.85	0.75
All employees	0.82	0.83	0.80	0.78

Bank Millennium	2023	2022	2021	2020
Senior management	0.83	0.79	0.77	0.81
Management	0.76	0.74	0.72	0.71
Sales personnel	0.88	0.89	0.85	0.84
Technicians	0.73	0.72	0.75	0.75
Other employees	0.84	0.87	0.83	0.73
All employees	0.82	0.83	0.81	0.79

The difference in the average compensation of women and men does not include the differences in geographic location, scope of duties and headcount structure of men and women in various positions in different areas of the Bank. It should be emphasized that the last factor in particular is of major

significance for the shaping of the average employee compensation. Most women are hired in the sales network, while men work chiefly in high technology areas (in the “technicians” category), where the market, due to a shortage of specialists, dictates significantly higher levels of compensation. The Bank reviews in detail all factors that may contribute to the differences in employee compensation between men and women.

[GRI 202-1,3-3] Ratios of standard entry level compensation by gender compared to local minimum wage in 2023

	2023		
	Men	Women	Total
Bank Millennium Group	148%	146%	147%
Bank Millennium	148%	146%	147%

The above presented ratio refers to the area of Millennium Group’s activity, i.e. Poland. The above indicator was calculated for the lowest employment category in the Bank Millennium S.A. Capital Group, which is the position of Assistant.

[GRI 202-1] In relation to persons performing work on a basis other than an employment contract, the relevant provisions of national law apply, particularly Labour Code.

3.4.5. FREEDOM OF ASSOCIATION

There are two trade union organizations in operation in Bank Millennium. More than 540 employees belong to the trade unions. The Bank cooperates with the trade unions within the scope defined by the legal regulations and the Trade Unions Act. **[GRI 402-1]** The Bank provides employees with information about changes in the relationship with it as an employer, taking into account the materiality criterion, in advance specified by the provisions of the labor law, i.e. at least 30 days.

[GRI 2-30] The Bank and companies from the Bank Millennium Group do not have a collective agreement with employees - employees are not covered by a collective agreement (0%). There are no trade union organizations in the remaining companies of the Group.

The Bank has in place a number of agreements with trade unions, among others regarding the remuneration rules and regulations, social fund and bonus rules and regulations, but they are not in the form of collective bargaining agreements.

The Bank encourages open communication through the “Milleforum” online forum and the World of Millennium intranet site. These tools serve to inform employees of the most important issues relating to the Bank while making it possible to submit remarks and exchange opinions on various topics. Additionally, the HR Department runs an **HR Zone** intranet site on which it regularly posts all the information of interest to employees about employee matters.

3.4.6. EMPLOYEE APPRAISAL

[GRI 404-3] Guidelines for creating the principles of employee evaluation, in particular with regard to the evaluation of work results and competency assessment, are included in the "Instructions for conducting employee evaluation at Bank Millennium S.A." Pursuant to this regulation, all employees are subject to periodic performance appraisals (all employees actively performing work in a given period).

In the Bank Millennium Group, all units and all categories of employees (senior management staff, management staff, sales employees, technical employees and other employees) are subject to periodic performance evaluations. Due to the exclusion from the assessment only of employees who do not meet the requirements regarding minimum seniority and working time specified in internal regulations, approximately 98% of employees actively performing work in a given period participate in cyclical assessment processes.

[GRI 404-3] % of active employees of the Bank Millennium Group taking part in the assessment

	Assessed	%	Not assessed	%	Total	%
% of active employees of the Bank Millennium Group taking part in the assessment	6,207	98.6%	91	1.4%	6,298	100%

[GRI 404-3] % of assessed active employees of the Bank Millennium Group by gender

% of assessed active employees of the Bank Millennium Group by gender	Assessed	%	Not assessed	%	Total	%
Women	3,951	98.5%	60	1.5%	4,011	100%
Men	2,256	98.6%	31	1.4%	2,287	100%

[GRI 404-3] % of assessed active employees of the Bank Millennium Group, divided into employee groups

% of assessed active employees of the Bank Millennium Group, divided into employee groups	Assessed	%	Not assessed	%	Total	%
Support	2,737	98.2%	50	1.8%	2,787	100%
Sales	3,470	98.8%	41	1.2%	3,511	100%

The assessment is made according to previously communicated, objective criteria. The assessment includes areas related to business results and employee attitudes that are important from the point of view of the established goals and mission of the organization. Employees are assessed e.g. in terms of cooperation, efficiency, quality and the level of commitment to the implementation of the entrusted tasks, taking into account risk mitigation and the application of the best banking practices. Depending on the group and the tasks performed, employees are assessed on a monthly, quarterly or semi-annual basis. The evaluation process is carried out in a regular and structured manner. Superiors are provided with information and guidelines for conducting an assessment interview with an

employee. The evaluation process is designed to summarize with the employee the results of the work done. The supervisor, together with the employee, as recommended by the employer, should discuss in detail the objectives and tasks to be evaluated that have been accomplished and present the criteria for the evaluation. In addition, in sales units, the area of providing feedback to employees is included as part of the criterion of team building and management.

The appraisal process makes it possible to compare the effects of work between employees, while at the same time fulfilling a motivational and communication function. Employee appraisal is an important element that can be the basis for bonus recommendations, personnel decisions and development activities aimed at raising the level of employees' competences.

Promotions*

Bank Millennium Group	Men	Women	Total
Upper management	3%	7%	5%
Management	9%	10%	10%
Sales personnel	35%	23%	26%
Technicians	14%	15%	15%
Other employees	11%	13%	12%
Total	21%	19%	20%

Bank Millennium	Men	Women	Total
Upper management	4%	9%	6%
Management	9%	11%	10%
Sales personnel	36%	23%	26%
Technicians	15%	15%	15%
Other employees	13%	14%	14%
Total	22%	19%	20%

*% of employees in a given group who were promoted

3.4.7. RECRUITMENT AND PROFESSIONAL DEVELOPMENT

Most job offers in the Bank Group are addressed to internal and external candidates. An employee who would like to develop his or her skills in some other area than up to now may express an interest in an internal job transfer.

Selected employees are assigned to **interdepartmental projects** initiated and supervised by the Bank’s Management Board. This affords an opportunity to share knowledge and gain new skills.

The number of people transferring internally in 2023 revisited the stable level from prior to the merger and the pandemic.

Internal recruitment - Bank Millennium*	2023	2022	2021	2020	2019
Number of employees	105	94	158	753	87

* Data for Bank Millennium, without internal recruitment data for other Group companies

Sourcing talent

Employer branding activities are an important part of the Bank’s activity. They are centered on several prospective employee groups: students and graduates, IT and Digital specialists, sales and support specialists and business development experts.

We are constantly working to reach the widest possible audience of external talented candidates, so we have a presence at selected universities, conferences, job fairs, recruitment and image sites and social media.

For individuals without work experience, we offer internship opportunities through our **Summer Internship Program**. It is important for us that young people entering the labour market and focused on professional development are able to realize their plans in our bank and build competence capital for the future. The goal of the program is to promote the Bank as an employer and to increase interest in banking careers. In 2023, Bank Millennium allowed 36 students and recent graduates selected in a recruitment process to carry out 2- or 3-month internships during the summer holidays. The interns learned new skills in 14 different departments. The internship program was preceded by carefully planned promotional activities that were to strengthen the Bank’s position as an attractive employer. In addition to receiving attractive salaries and obtaining individual development guidance from their supervisors, the interns were invited to attend training and after the internship was over some of them received a job offer at the Bank.

In 2023, the Bank was involved in cooperation with renowned universities, including the Warsaw School of Economics and the SWPS University of Social Sciences and Humanities. Since the Bank is a member of the **Warsaw School of Economics’ Partners Club**, its employees take an active part in meetings with the Club’s Council to discuss elements of the university’s strategy and the possibility of educating students on key competences. The Bank as a teaching partner of the psychology and computer science major at the SWPS University of Social Sciences and Humanities introduces students to practical solutions in the User Experience area. This cooperation allows the Bank to better prepare professionals for work and actively promote professional opportunities at the bank. Through its presence and involvement in projects at universities, the Bank enhances its image and builds brand loyalty among students and graduates.

Once again, the Bank became a partner of this year’s edition of “Economic Bridges”, a nationwide project implemented by the SGH Student Government and the Forum of Economic Universities. The

main goal of the project is to integrate the academic communities of business schools in Warsaw, Kraków, Wrocław, Katowice and Poznań and to build partnership relations between academia and business. The projects offers students an opportunity to participate in workshops, case studies, inspiring lectures and to meet with business people with an extensive track record.

The Bank regularly participates in **job fairs**, which are well attended by university students and graduates. Between March and May, the Bank attended seven fairs in Warsaw, Wrocław and Kraków, organized by, among others, Absolvent Talent Days, Pracuj.pl, Warsaw University of Life Sciences, Warsaw IT Days, Faculty of Management of the Warsaw University and Gdańsk University of Technology. Recruiters share information about internships or jobs, present a broad range of career opportunities in various fields and talk about the recruitment process itself.

The Bank enjoys sharing its knowledge and it was happy to assume the role of a partner and participant of **conferences** to acquire knowledge and find professional inspiration. In 2023, Bank Millennium participated in two conferences devoted to Java software and the Microsoft Azure cloud. The meetings were addressed to architects, developers, devops, Cloud and Big Data specialists, as well as university students and young people interested in the IT industry. Our experts were speakers at the conference. The main purpose of their presentation was to show modern Java programming techniques and Microsoft Azure cloud solutions. Participants could see how the Bank uses modern technologies and best practices of modern programming.

The Bank takes advantage of the communication opportunities afforded by social media such as LinkedIn and Goldenline and popular image and recruitment portals to reach candidates efficiently with information about benefits of working for the bank and a more effective promotion of job offers.

Rewards for employees

Bank Millennium runs programs rewarding employees who show outstanding commitment.

IMPAKT Employee Reward Program in which employees reward their work colleagues. The Program integrates the community and builds a culture of cooperation and mutual appreciation. In 2023, 50 employees were recognized for their commitment, improvement of quality, innovative solutions and accepting challenges to inspire others. The program gala and the awards ceremony took place at the Verde Hotel in Warsaw with some 110 persons in attendance.

Once a year, best employees and managers are rewarded with the **President's Prize** for their outstanding professional achievements. In 2023, the prizes were presented to 14 employees in the head office and the sales network.

Training

[GRI 3-3] Training in Bank Millennium is a major part of daily activity and is treated as an investment in human capital. The purpose of training is to enhance the competences of employees, which translates into improving quality and work productivity and achieving current and future business objectives. The area of training is regulated by the Instructions for participation in training programs at Bank Millennium S.A.

Every year Bank Millennium employees have an opportunity to participate in internal and external training and in conferences and congresses. As part of the care for employee health, most training was administered remotely or in a hybrid form, while some was held on-site while observing the sanitary regime. Some of the training courses were delivered in the form of e-learning sessions.

Number of e-learning training topics	Bank Millennium				Bank Millennium Group			
	2023	2022	2021	2020	2023	2022	2021	2020
Number and % of employees who took advantage of the offer	1,443**	2,033*	1,002	495	1,460**	2,038*	1,009	490

**The increase stems from migrating training sessions from three external platforms to the Bank's internal training platform (Pluralsight, DataCamp, Leanovatica). Approx. 1,500 training course topics come from the platforms purchased by the Bank. The pandemic has also contributed to holding more training sessions online.*

***A decrease compared with 2022 - data migration from the Leanovatica platform only (new name: Youniversity)*

The matters associated with ESG training are described in chapter 2.5. "Environmental education".

Introductory training for new employees of Bank Millennium Group - this training was conducted remotely using MS Teams software and on-site.

Millennium Campus - a program to develop knowledge and skills with the objective of supporting the growth of innovation across the organization. The offer to participate in this program is addressed to all employees, it allows them to look at many topics from a different perspective. Lectures are held online, while recordings and aids are made available on the training platform and via the intranet under the "World of Millennium". In 2022/2023, we delivered a series of lectures related to security, understood in a broad sense.

Development Fridays

The program aims at enabling the exchange of knowledge and experience among the Bank's employees. Speakers include specialists who share their knowledge and experience through lectures.

The offer to participate in this program is addressed to all of the Bank's employees. Lectures are held online, while recordings and aids are made available on the training platform and via the intranet under the "World of Millennium".

External training platforms

Employees have access to the Legimi platform, offering business literature and fiction. The Legimi platform makes it possible to take advantage of an offer of more than 195,000 e-books and audiobooks. The platform is available to employees on mobile devices (tablets, e-book readers, smartphones) and private computers. Books may be read or listened to online or offline and may be used without limitation.

The Bank continues training courses on Professional Agile Leadership - Essentials PAL-E and on Professional Scrum Product Owner for IT managers.

Training for branch and franchise network employees

- Specialist introductory training for new employees in own branches and the franchise network.
- Certification workshop on the Savings and Investment Model (MOI) - prepares people to sell savings and investment products according to the MIFID regulations and supplies knowledge about the standards required under the savings and investment model.
- "ABCs of phone sales", "Phone sales - objections", "Business basics - accounts" for employees in the own and the franchise networks.

- “Business ABC - basic offer for business clients” - remote training for employees of the retail network.
- “Credit needs model - effective use of sales skills”, “Effective conversation with the client - ‘right on the money’ model”, “Master of Funds” - for own network employees.
- “Sales conversation with a business client” development training for the business area, aimed at improving product and sales knowledge. It is conducted on-site.
- Development training entitled “Mortgage after-sales service - loan process and tranches” and “Mortgage after-sales service - notarial deed and insurance”, “Home construction” in the area of mortgage loans, aimed at improving product and sales knowledge. It is conducted on-line.
- Product and sales training for retail network employees pertaining to credit products, conducted as part of Development Wednesday, with the aim of preparing employees for credit certification. Consists of a bundle of 6 training sessions in an online formula.
- Product and sales training for retail network employees pertaining to savings and investment products, conducted as part of Development Wednesday, with the aim of preparation for investment certification. Consists of a bundle of 6 training sessions in an online formula.
- Product and sales training for retail network employees pertaining to mortgage products, conducted as part of Development Wednesday, with the aim of preparation for mortgage certification. It consists of one training session delivered in an online formula.
- Training sessions for retail network employees presenting an account offering to commercial undertakings.
- The credit and investment certification process consists of intensive workshops culminating in an exam, which tests the new knowledge, and a review of business conditions. The workshops are delivered on-site.
- The process of conferring mortgage certificates consists of training and an examination confirming the acquired knowledge and the fulfillment of business conditions. It has the form of online workshops.

Training for Direct Banking Department employees

- Specialist introductory training for new employees.
- Quality Philosophy Workshops.
- Training in sales techniques: “Active offering”; “Working with numbers”.
- Consolidation loan training to improve product and sales knowledge.
- Insurance training titled “APK in a conversation with the client”; “Loan under protection”.
- Customer service workshops: “Juniors”, “Young adults”.
- Development training called “Become a Mentee” - a course preparing experienced employees to receive calls in a substantive internal help line.
- Training in the “Academy of Talents” project - use of MS Office and CC tools in the work of a manager, “Work planning - schedule”, “Effective feedback”, “Running workshops”, “Plain language”.
- Training for employees of mortgage teams aimed at improving product and sales knowledge in the area of cash loans.

Training for Corporate Banking Department employees

Employees working in the field of corporate banking participated in a number of training courses aimed at upgrading their qualifications and extending their knowledge of changing products and procedures.

The most important training courses concerned the investment loan process, a new module of the system for handling the lending process and changes to the conditions of opening and operating accounts. The recent changes brought also KYC training courses.

Key and, most importantly, periodic events include meetings held within the framework of the Public Aid Pulse initiative, initiated in June. The meetings of experts from the competence center for public

aid with sales network relationship managers organized every two weeks focus on a comprehensive overview of the current possibilities of obtaining public aid. Topics discussed support advisors in preparing clients for further recruitment and discussion about the available possibilities for investment project financing. Owing to this initiative, advisors can have access to the most up-to-date information which can be discussed on an on-going basis in a forum focusing on issues of substance, also on the basis of examples from everyday work.

The Bank regularly provides advisors with knowledge of the current macroeconomic situation and its impact on the markets and the companies' operations. We do this in the form of monthly webinars conducted by the employees of the Bank's Macroeconomic Analysis Office. The information is supplemented by industry analyses made available on the intranet.

Training for employees selling insurance products

On top of product training sessions ending with an exam to confer authorisation to commence the sales of insurance, Bank employees who sell insurance products went through annual professional training sessions to enhance their competences in terms of performing tasks involving insurance intermediation. Besides legal issues much attention during training sessions is devoted to the general rules and practical aspects of distribution activity.

[GRI 404-2] Management programmes

Manager Certification - a training program for the managers of retail outlets in the Bank's own network. The following stages are part of this program: The ABCs of a contemporary manager, Goals, Development, Motivation and Team Building. The program's goal is to improve the practical managerial skills of defining, communicating and controlling goals, building team commitment towards their active achievement and sales team management. Particular attention is focused on planning development activities and working on competences of employees in reference to the allocated tasks.

Development training for heads of retail outlets - a training program supporting managers in the continuation of development of their skills. In 2023, the first of the scheduled training sessions was launched - "Self-Management in Time".

M#leaders

In 2023, the Bank completed another edition of the M#leaders leadership skills improvement program.

The 5th edition of the program was addressed to persons holding managerial positions in the head office and in the Bank's companies. Two training paths were prepared for managers:

- **M#LEADERS LEADERSHIP FUNDAMENTALS** - for persons who did not previously work with the program,
- **M#LEADERS LEADERSHIP NEXT LEVEL** - for participants of previous editions who were interested in developing competences at a subsequent level.

The on-site workshops started in January and ended at the beginning of July 2023.

Youniversity

Youniversity is a website providing access to the knowledge and experience of the best trainers from Poland and abroad. It is a unique content ensuring development both in business and in private life. It makes it possible for Managers to develop their competences through the use of a streaming service and knowledge from over 57 thematic areas. New series and video courses are launched even a few times a month. This allows managers to build a regular development routine.

Development training for Regional Directors

A series of management training courses delivered by Inspire Leadership to enhance skills and competencies.

The training program includes the following topics:

1. Motivation (motivation techniques, building intrinsic motivation, building intrinsic motivation in Managers, ability to maintain motivation in employees, motivation vs. delayed gratification, elements that influence motivation, practical exercises).
2. Development of managers (the practice of coaching and mentoring conversations, 1:1 coaching conversations and activities, development conversations).
3. Public speaking (storytelling and motivational speeches).
4. Feedback (giving feedback, for example on the use of routines, on work within branches), skills of seeking and receiving feedback, positive feedback (with an emphasis on “good” consequences).
5. Mindfulness (how to observe, analyse and discuss the results of observation - e.g. of the work of a manager, branches), which is mindfulness in a business setting, self-assessment of the observed person, maintaining data vs. human balance - versatility).
6. Team building (team vs. group - e.g. in connection with the absence of a common numerical goal, community of problems and ways to overcome them, community of development, gaining knowledge and sharing experiences, teamwork culture)
7. Situational management (preparation for working with different consultant types in accordance with the Blanchard method; awareness that guidance may be needed even if you have experience).

Training for the Affluent Client Banking Department

The 1st stage of the Affluent Client Banking Expert Certification - the program consists of two two-day training sessions delivered in an on-site mode.

The Psychology of Client Decision Making training is delivered by AD Training and its purpose is to improve the effectiveness of sales through developing skills in identifying and adapting the communication style - client typology, handling clients' concerns and doubts and finalizing the sale.

The Financial Markets and Investing training conducted by Alfred Adamiec. The purpose of the training is to broaden and systematize knowledge of financial markets and investing. Issues concerning the money market, debt or equity instruments, the foreign exchange market, the business cycle, investment funds, a portfolio made up of financial instruments and the methods of overcoming difficult situations in a relationship with a Client are discussed during this training.

Level 3 EFPA EFA financial advisor training This level confirms that the advisor is capable of working individually with middle-income/affluent clients, has good understanding of the diversity of client needs and profiles, and can package financial products to meet client expectations. An EFPA EFA advisor focuses on long-term cooperation with the client, which requires regular monitoring of the client’s standing and the products used by the client. An EFPA EFA advisor should also be able to identify situations in which it is appropriate to seek assistance of experts in specialised fields. At the end of the Course, participants take an international exam and receive the EFPA EFA (European Financial Advisor) certificate.

EFPA ESG advisor training. The certificate confirms that an advisor has knowledge of the basics of sustainable investments, the characteristics and benefits of sustainable finance, is able to identify a

client’s interest in sustainable investment, to ultimately select ESG products that match with the values and objectives important to the client. A holder of the EFPA ESG Advisor certificate is a trusted financial and business advisor to a client who is aware of and committed to the development of ESG in Poland in terms of environmental, social and governance issues.

[GRI 404-1] Average number of training hours by gender and position

Bank Millennium	Women	Men	Total
Average number of hours per employee	50.1	42.0	47.2
Management Board	-	58.1	58.1
Senior management	23	23	23
Management	43.2	39.9	41.5
Sales personnel	62	60	61.4
Technicians	21.4	19.9	20.7
Other employees	18	16.3	17.5

Bank Millennium Group	Women	Men	Total
Average number of hours per employee	48.7	40.7	45.8
Management Board	0.0	58.1	58.1
Senior management	23.3	23.2	23.3
Management	41.0	38.7	41.0
Sales personnel	62.0	60.0	61.4
Technicians	20.2	19.2	20.2
Other employees	17.2	16.0	17.2

[GRI 404-2] On account of the small number of employees in retirement age, no programs are currently being run to support the continuity of employment and facilitate the process of retiring. Individual training sessions, however, are possible upon request.

Training in the form of webinars as part of the DIVERSITY is OK! initiative

This initiative is based on the Diversity Charter. We want to reach the largest possible number of male and female employees, so we have decided to organize meetings in the form of webinars. We pay attention to gender, age, salary, well-being at work, building relationships through proper communication, dysfunction, international culture. We want to make sure that each person within the organization feels important and that what makes us different could unite us and create synergy in the workplace.

Since March 2023, we have organized webinars on Body Positivity, Gender Equality, Gender Pay Gap, Communication in Multigenerational Teams, Feminatives, and She and He in Business - Synergy Effect.

The materials are available on the Cornerstone training platform.

First aid training

In 2023, we organized a series of first aid training. Interested employees had the opportunity to take part in on-site first aid training (in the Bank’s Head Offices in Warsaw, Gdańsk and Wrocław) and in short forms of on-line instructions conducted by qualified rescue workers cooperating with SEKA. In addition, we also proposed workshops for children of our employees (implemented in BM Head Offices) The project was met with great interest and its goal was to spread the knowledge of how to safely administer first aid in life-threatening or health-threatening situations.

3.4.8. SOCIAL BENEFITS

[GRI 401-2,3-3] Bank Millennium Group employees are offered the same social and benefits in kind regardless of the type of the employment agreement (for a definite/indefinite term) and the working time (part-time/full-time) and the place of working. The amount and scope of benefits depend on the employee's life and financial situation.

The Bylaws of the Company Social Benefit Fund regulate the Bank's social activity. According to these Bylaws, the Bank pursues the following initiatives:

- conducting leisure, cultural, sporting, recreational and tourist activity,
- organising events and group meetings,
- providing material or financial assistance,
- providing financial assistance in individual events of chance, a particularly difficult financial, family or life situation (financial assistance that does not have to be repaid), also in states of emergency or epidemiological risks.

The subsidiaries tap into the social benefits offering offered by the Bank but they finance it using their own Social Benefits Funds.

Hardship assistance

Under their social assistance the Bank and subsidiaries offer assistance to employees who are in a particularly difficult financial, family or life situation. Retired employees can also apply for aid after their employment ends due to their difficult financial or health situation.

Benefits awarded to Bank employees	2023	2022	2021	2020
Financial assistance (PLN)	545,420	695,465	517,320	388,550
Number of employees who received financial assistance	118	158	122	120

Life insurance

Employees may join a group life insurance on preferential terms. The insurance covers life and health of the insured and their family members. Six insurance variants are available so that everyone can match the offer to their needs.

Life insurance	Bank Millennium Group				Bank Millennium			
	2023	2022	2021	2020	2023	2022	2021	2020
Number and % of employees who took advantage of the offer	3 033 (44%)	3 034 (43%)	3 267 (46%)	2 982 (44%)	2 924 (45%)	2 932 (44%)	3 120 (47%)	2 840 (45%)

MyBenefit cafeteria platform

[GRI 403-6] We have a cafeteria platform that allows you to make online purchases of various products and services from the Company Social Benefits Fund. On the platform, an employee can take advantage of the offer of over a thousand different benefits, in particular the offer of tourist, cultural, sports and recreational services. The employee independently chooses which benefits he is interested

in and realizes them at any place and time. The platform also includes a MultiSport sports card, which comprehensively provides employees with access to various sports activities, such as a swimming pool, gym, fitness, squash, as well as dance lessons, yoga classes, martial arts and a climbing wall. By using the card, employees have the opportunity to lead a healthy and active lifestyle. Additionally, they can purchase a sports card for their loved ones at specially negotiated price conditions. Retired employees can also benefit from the offer of a sports card after termination of their employment as part of a specially dedicated card for seniors.

Christmas benefit

Before Christmas, employees can count on financial support in the form of a **Christmas benefit**. The benefit amount varies depending on a given employee's financial situation.

3.4.9. FRIENDLY WORKPLACE

[GRI 3-3] In addition to providing attractive working conditions, development and social support, Bank Millennium supports employees returning to work after a maternity/parental leave, and encourages participation in charitable activities, employee volunteerism, sports and cultural activities.

[GRI 401-3] Returning after maternity/parental leave

Bank Millennium Group	2023		Total			
	Men	Women	2023	2022	2021	2020
Employees entitled to leave	12	485	497	616	711	821
Employees who took leave	10	307	317	349	407	472
Returned to work after leave	8	280	288	329	364	438
Employed 12 months after returning from leave	1	256	257	282	330	198
Percentage returning after leave	80%	91%	91%	94%	89%	93%
Percentage of employees retained by the Bank who returned from leave	100%	78%	78%	78%	75%	84%

Bank Millennium	2023		Total			
	Men	Women	2023	2022	2021	2020
Employees entitled to leave	12	471	483	592	686	798
Employees who took leave	10	297	307	333	397	459
Returned to work after leave	1	312	313	313	355	426
Employed 12 months after returning from leave	1	242	243	273	318	195
Percentage returning after leave	80%	91%	91%	94%	89%	93%
Percentage of employees retained by the Bank who returned from leave	100%	78%	78%	77%	75%	84%

Individual approach to the form and time of work

Bank Millennium Group employees are subject to one of the following working hour schedules: fixed (the main one), shift-based, task-based or balanced. The selection of a system depends on the type, organisation and place of work and the business requirements in a specific area.

In response to an employee's written request, their superior may set an individual work time schedule within the framework of the system applicable to that employee. Working remotely is also possible through individual arrangements. Employees may work part-time insofar as the conditions for the Group to operate in a given area facilitate that. Many employees with parental rights are taking advantage of this solution.

Work in a hybrid mode

The hybrid work mode developed and widely used during the COVID-19 pandemic has been introduced in the Bank Millennium Group. The Bank recommends that employees work 50% of time in the office and 50% on a remote basis, with the organizational unit Managers being authorized to modify these proportions as the needs require in connection with the tasks and projects in progress and the effectiveness achieved by employee teams. Such a solution makes it possible to combine the needs of the employees with the interest of the employer.

Employee volunteerism

The actions taken by volunteers of the Bank Millennium Group in 2023 are described in section "Socially beneficial activities".

3.4.10. APPOINTMENT, ELECTION AND ASSESSMENT OF GOVERNING BODIES

[GRI 2-10,2-18]Supervisory Board Members are appointed for a joint term of office. The Supervisory Board's term of office is 3 years (the term of office is calculated in full financial years). Supervisory Board Members are elected by the Shareholder Meeting. The Supervisory Board has at least five members. At least half of the Supervisory Board members, including its Chairperson, should hold Polish citizenship. At least two Supervisory Board members should be independent members. The number of the Supervisory Board members is determined by the Shareholder Meeting. Should the membership in the Supervisory Board terminate before the expiry of the term of office, the next Shareholder Meeting fills the vacancy on the Supervisory Board. The Supervisory Board elects its Chairperson, Deputy Chairpersons and Secretary from among its members. The Supervisory Board may establish standing or ad hoc committees of the Supervisory Board. The Supervisory Board's standing committees are the Audit Committee, the Personnel Committee, the Strategic Committee and the Risk Committee. With respect to the Audit Committee, the Bank's Articles of Association stipulate that the majority of the members of this committee, including its chairperson, are independent members.

The Supervisory Board determines the number of the Bank's Management Board members, and appoints and dismisses the President, Vice-Presidents and the Bank's Management Board members. Management Board Members are appointed for a joint term of office. Management Board Members are appointed for three years (the term of office of the Management Board is calculated in full financial years). The Bank's Management Board has at least three members, including the President. The Vice President or Vice Presidents may also be appointed to the Management Board. Shareholders and persons other than shareholders may be appointed to the Management Board. At least half of the Management Board members should hold Polish citizenship. The Supervisory Board approves the internal division of powers in the Management Board determined by the Management Board.

Before Management Board members and Supervisory Board members are elected, the Bank may assess their individual and collective suitability for the role with the participation of an external advisor. The assessment is conducted in accordance with the methodology of the Polish Financial Supervision Authority. The evaluation of the Management Board is carried out by the Supervisory Board. However, as the Shareholder Meeting elects the Supervisory Board, the evaluation is made by the Shareholder Meeting.

The suitability assessment made in the process of electing Management Board members and Supervisory Board members takes into account all available information about the candidates that may affect the election, including competences necessary to manage the company's impact on economic, environmental and social issues. The Bank also takes into account the diversity of education, professional experience and competence, nationality, gender and age when appointing members of the governing bodies, as well as - in the case of the Supervisory Board members - their independence as defined in general regulations.

The Bank's Management Board is assessed by the Personnel Committee of the Supervisory Board. The Committee evaluates the actions of the Management Board on the basis of an assessment of financial performance (economic indicators) in relation to the achievement of intended goals, also in the context of the actions of competitors and the market situation, an assessment of risk management, and an assessment of non-financial elements, in particular the quality of leadership, human capital management and cooperation between the various areas of the Bank. The awarding of variable remuneration for Management Board Members for 2022 was based on an assessment. The majority of the Personnel Committee members are independent Supervisory Board Members. A comprehensive assessment of the Management Board is made once a year on the basis of the economic results achieved by the Bank. In addition to the above powers, the Personnel Committee supervises the Management Board's activities as regards the implementation of the HR policies and monitors the Management Board's activities in the HR area. The Personnel Committee positively assessed the activities undertaken by the Management Board. No changes to the composition of the Management Board were proposed.

3.5. EMPLOYEE HEALTH AND SAFETY

3.5.1. MEDICAL CARE

[GRI 3-3, 401-2] The private medical care plan allows employees to have access to basic and specialist medical consultations, detailed diagnostic tests and prevention programs. The medical package is offered to employees employed under an employment contract (for a fixed/indefinite period) with a minimum of half-time employment. The scope of the medical package provided to an employee varies depending on the position held. In each case, employees can purchase various medical packages for immediate family members (spouse, children, parents, also siblings). Retired employees can also continue private medical care after termination of employment on preferential terms.

In 2023, the medical service provider was changed and the scope of medical services offered in the standard medical package was expanded. As part of the newly negotiated scope of the medical package, employees gained access to a larger number of specialist doctors, medical procedures and access to comprehensive medical diagnostics. Standard medical packages include, among others, access to limited psychological consultations, health prevention programs (vaccinations, laboratory tests), as well as periodic dental check-ups extended to include dental prophylaxis. As part of permanent, annual health prevention, a medical diagnostic program is available, focused on the most common cancers in women and men.

3.5.2. OHS STANDARDS

[GRI 3-3, 403-1, 403-6] Occupational Health and Safety activities are regulated in the Instructions for managing occupational health and safety and fire protection in Bank Millennium. They include standard occupational health and safety topics, fire protection, labour law basics and training in these areas.

[GRI 403-1, 403-2] The OHS audit activity is a scheduled activity based on the annual audit plan, which covers at least 50% of all the Bank's branches in any given year. All the materials from reports, post-inspection recommendations or post-accident documentation are then used by the Bank's relevant organizational units for improvement of safety. The key risks related to failing to observe OHS rules pertain to the possibility of employees sustaining unfavourable health consequences (chiefly falling, getting hit, mental and physical burdens), the ensuing absence from work and the requirement to disburse damages. The essence of the adopted solutions is to ensure the Bank's capacity to continuously identify hazards in all areas of its business, including those arising from cooperation with other entities, cooperation with subcontractors, and to manage the risks associated with these hazards. The "Defect Reporting" system currently being implemented with the main purpose of rapid and direct elimination of hazards, will improve the efficiency of identification of threats.

The causes and circumstances of work-related accidents are investigated not only to fulfill insurance obligations but also to educate and prevent any additional undesirable events (post-accident recommendations). All the materials from reports, post-inspection recommendations or post-accident documentation are then used by the Bank's relevant organizational units for improvement of safety.

An effective way of preventing these types of risks is to deliver training to employees and administer regular inspections of offices and the Bank's branches with an eye to compliance with the rules of fire protection and OHS. All new employees are familiarised with the occupational risk assessment for individual jobs.

[GRI 403-3] The health care provided to employees comprises occupational medicine services, including preventive healthcare examinations for employees during their working hours and at the employer's expense.

[GRI 403-4] The Bank cooperates with trade union representatives within the framework of the OHS Committee and with Social Labor Inspectors whom it consults about OHS issues and working conditions.

[GRI 403-5] All new employees take part in obligatory OHS and fire protection training. The management staff is additionally obliged to attend regular refresher and complementary training in this field. Depending on the needs, the Training Team organises first aid training.

[GRI 403-7] The Bank restricts cash handling in retail outlets, which significantly mitigates risks related to and adverse effects of crime (physical and mental injuries).

[GRI 403-9] Occupational health and safety	Bank Millennium Group				Bank Millennium			
	2023	2022	2021	2020	2023	2022	2021	2020
Accidents at work *	29	28	40	36	28	28	39	34
Fatal accidents at work *	0	0	0	0	0	0	0	0
Lost days ratio **	0.02%	0.04%	0.07%	0.08%	0.02%	0.04%	0.07%	0.07%
Absence rate ***	6.33%	7.54%	9.00%	11.20%	6.51%	7.73%	9.33%	11.85%
OHS training ****								
Number of participants	5,354	1,677	1,264	1,175	5,032	1,516	1,181	1,099
% of participants	78%	24%	18%	17%	78%	23%	18%	17%
Branch audits	139	139	292	197	142	142	306	197

*Number of employees who had accidents.

**Impact exerted by accidents and occupational disease on employee absenteeism. This indicator is computed by comparing the total number of days lost with the total number of hours planned to be worked.

***Indicator measuring an absent employee's actual number of days lost expressed as a percentage of the total number of days planned to be worked by employees in this same timeframe.

****Introductory and periodic training (conducted once every 5 years).

BANK IN SOCIAL ENVIRONMENT

3.6. SOCIAL ENVIRONMENT

[GRI 2-29] In 2023, it was assumed that the findings from the revision of the Bank Group's stakeholder list presented in the 2022 ESG Report are still valid, which was confirmed during the workshop held on 24 November 2023 with representatives of the Bank and the Bank's Group units. The stakeholder matrix is illustrated in the chart below.



3.7. COMMUNICATION WITH STAKEHOLDERS

[2-29] The stakeholders' expectations and opinions are taken into account when innovations and improvements are made to the Bank's products, services and operations. In 2023, the Bank updated the matrix of important topics as part of a dialogue with representatives of various stakeholder groups. The process is described in detail in section "Defining the content of the report - dialogue with stakeholders" of this report.

The feedback from stakeholders is received additionally from the following sources:

Stakeholder	Communication channels	Topics raised	Bank's actions
 <p>INVESTORS AND MARKET ANALYSTS</p>	<ul style="list-style-type: none"> ▪ Shareholder Meeting ▪ Roadshows and conferences ▪ Meetings ▪ Stock exchange communication and press releases ▪ Dedicated website (reports, presentations etc). 	<ul style="list-style-type: none"> ▪ Transparent activity, quick and easy access to information about the Bank, ethical and socially responsible business. 	<ul style="list-style-type: none"> ▪ Compliance with corporate governance rules, ensuring transparency, security and ethical character of operations, quick exchange of information through multiple communication channels with shareholders.
 <p>CLIENTS</p>	<ul style="list-style-type: none"> ▪ Branches, Internet and mobile banking, ▪ Intranet, community forum, ▪ Hotline ▪ Complaints ▪ Satisfaction surveys 	<ul style="list-style-type: none"> ▪ High quality of products and services offered, ethical marketing and selling practices, safety of deposited funds, ease of use of products and communication with the Bank, improvements in accessibility of the Bank's services and non-banking services. 	<ul style="list-style-type: none"> ▪ Fast and easy access unfettered by obstacles to banking and non-banking services, ethical advertising and sales, providing explicit information about the conditions for using services, easy contact with the Bank, ensuring the safety of client funds.
 <p>EMPLOYEES</p>	<ul style="list-style-type: none"> ▪ Intranet, Internet, community forum ▪ Whistleblowing system ▪ Market analyses ▪ Employee evaluation 	<ul style="list-style-type: none"> ▪ Stability of employment and professional development opportunities, fair salary, friendly working conditions, possibility to engage in social activities. 	<ul style="list-style-type: none"> ▪ Communication with employees and responding to their expectations, professional competence development programmes, programmes for parents, co-funding of activities outside the workplace, and employee volunteerism offer.

 <p>SUPPLIERS / BUSINESS PARTNERS</p>	<ul style="list-style-type: none"> ▪ Periodic meetings ▪ Telephone, e-mail ▪ Negotiations and performance of agreements 	<ul style="list-style-type: none"> ▪ Fair rules for selecting and cooperating with suppliers. 	<ul style="list-style-type: none"> ▪ Use of objective procedures for selecting suppliers; timely performance of agreements; selection of suppliers in consideration of ethical and environmental criteria.
 <p>SOCIAL ENVIRONMENT</p>	<ul style="list-style-type: none"> ▪ Offers of cooperation ▪ Contacts with NGOs ▪ Meetings with students ▪ Employee volunteerism 	<ul style="list-style-type: none"> ▪ Supporting social projects by the company and employees. 	<ul style="list-style-type: none"> ▪ Merit-based and financial support for social projects; financial education; encouraging employees to take part in social and volunteering campaigns.
 <p>ENVIRONMENT (ORGANISATIONS INVOLVED IN ENVIRONMENTAL PROTECTION ACTIVITIES)</p>	<ul style="list-style-type: none"> ▪ Environmental rankings ▪ Monitoring changes in market trends and legislation 	<ul style="list-style-type: none"> ▪ Reducing our own unfavourable impact on the environment, engaging in responsible project finance, environmental education. 	<ul style="list-style-type: none"> ▪ Monitoring lowering impact on the environment, rules governing the provision of funding for projects exerting an impact on the environment, environmental education programs.
 <p>REGULATORS (KNF, BFG, UOKIK, NBP, KSF)</p>	<ul style="list-style-type: none"> ▪ Reports ▪ Communication ▪ Regulatory audits 	<ul style="list-style-type: none"> ▪ Recommendations regarding Bank's activity. 	<ul style="list-style-type: none"> ▪ Reporting and implementing recommendations provided by regulators.

3.8. SOCIALLY BENEFICIAL ACTIVITIES

[GRI 203-1] Social programs are chiefly run by Bank Millennium through the Bank Millennium Foundation. The Foundation’s statutory and strategic goal is to support social activism to build a modern civic society through educational activities, volunteerism and promotion of culture. Its mission, “multiplying social capital” refers to the support given to projects that encourage action for the benefit of local communities. The foundation activates, supports and educates. Its social programs pertain to financial education, patronage of culture, academic education and employee volunteerism. In 2023, the Bank’s and Foundation’s social activities also focused on ecology and protection of the planet. Activities for the benefit of the natural environment are an integral part of Bank Millennium’s strategy, through which it pursues numerous initiatives aimed at reducing or eliminating any negative environmental impacts. In 2023, the Bank and the Bank Millennium Foundation launched a new edition of the employee volunteerism program: OUR PEOPLE’23: SAVE THE PLANET, within the framework of which more than 217 employee volunteers implemented 26 eco-initiatives. The sports part of the campaign, in which 1,508 people participated, brought about reduction of carbon dioxide emissions by 71 tons.

[OWN DISCLOSURE 9] Donations (D) and sponsorship (S) in PLN	Bank Millennium Group				Bank Millennium			
	2023		2022		2023		2022	
	D	S	D	S	D	S	D	S
Culture		589,170		550,509		589,170		550,509
Education	551,958	489,041	448,000	107,137	551,958	489,041	448,000	102,137
Charitable activities	294,402		341,443		294,402		341,443	
Sports								
Media								
Social organizations	196,936	36,900	840,000	79,057	196,936	36,900	840,000	79,057
Trade unions								
Other	5,000	18,209			5,000	18,209		
Total	1,048,296	1,133,320	1,629,443	736,703	1,048,296	1,133,320	1,629,443	731,703

[GRI 413-1] Social engagement commitments of the Bank Millennium Group are defined in the “Bank Millennium S.A. Sustainability Policy”, of which the following documents published on the Bank’s website (<https://www.bankmillennium.pl/en/about-the-bank/esg#zasady-esg>), are an integral part:

- Sustainable Development Principles
- Principles of Social Impact
- Corporate Volunteerism Principles

The following regulations apply to 100% of entities and therefore for all operational activities in the Bank Millennium Group in relation to the local community understood as the entire territory of Poland.

The Bank Millennium Group does not provide financial and in-kind support to political parties and politicians.

The Bank is involved in numerous activities to engage local communities, support their development, and assesses and monitors its impact on local communities. Activities supporting local communities are described in detail in chapters 3.8.1 - 3.8.4 of the ESG Report.

3.8.1. EDUCATION PROGRAMS OF BANK MILLENNIUM FOUNDATION

[GRI FS16] Since 2016, the Bank Millennium Foundation has been running its own financial education program for kindergarten children, called the “Financial ABCs”, as part of which it has organized education workshops in various formats to teach financial knowledge to kids, their parents and pre-school teachers. It has been consistently aiming at reaching the minds of kids and their carers and has been successful in accomplishing this objective. The program is carried out in accordance with an original concept by professional instructors and Bank Millennium volunteers.

The Foundation continued the program in 2023 on an on-site basis and successfully concluded its two successive editions (10th and 11th). The Financial ABCs Workshops meet the current needs and respond to changes in children’s awareness, which are due to the important role that the virtual world plays in their lives. The youngest students learned about money and its value. The program is addressed to children of pre-school age (3-6 years) and envisages the introduction of kids into the world of finance through play and interesting meetings with a lot of attractions. The workshops are delivered in cooperation with the Verba Foundation.

In 2023, as part of the tenth and eleventh editions, the Foundation implemented more than 400 workshops in 119 kindergartens nationwide and reached nearly 10,000 preschoolers. This year’s activities activated the children’s community - during the activities, the children used specially prepared coins and banknotes. The workshops were held, as always, with the participation of program volunteers and the main character and the key mascot of the program - Sebastian.

In 2023, the program has again been enriched with knowledge of cyber security, new forms of payment (BLIK), payments made over the Internet and new technologies. Participants in the Financial ABCs classes explored financial literacy through talks, games and using the foundation’s educational materials. The workshop program enabled children to become acquainted with new technological possibilities which are to be available for them in the adult world, but which they can explore today.

The goal of the Financial ABCs is to teach and activate children about finances and security, from an early age. In the workshops, knowledge about the value of money, its forms, the ability to plan and save, and how to navigate the world of finance consciously and safely is taught in an interactive way.

In addition, Bank Millennium Foundation has made educational materials available to parents, teachers and other persons interested through its website, social media and YouTube channel. These include: tutorials providing guidance on effective financial education for the youngest children; articles explaining how to teach about saving, entrepreneurship, charity, technology and operations of a business; a series of interviews and videos available on YouTube.

This year’s program has been run under the honorary patronage of the Ministry of Finance, which additionally confirms that the course adopted for the program development is appropriate, the Foundation’s statutory objectives are accomplished and the program has an educational value.

3.8.2. CHARITABLE CAMPAIGNS AND EMPLOYEE VOLUNTEERISM

Our People'23: Save the Planet

[OWN DISCLOSURE 8] The Bank Millennium Group attaches great significance to the involvement of its staff in social campaigns. In order to enable their pursuit of their own volunteerism ideas, internal competitions are held to motivate the bank community to be active, in which grants to be used for the execution of the employees' charitable projects are conferred. Within the Bank Millennium Group, community-focused initiatives are managed by the Bank Millennium Foundation.

Bank Millennium and the Foundation are not indifferent to environmental problems, which is why an employee volunteer program called Our People'23: Save the Planet was implemented in 2023, focused primarily on protecting our planet, targeting all employees of the Bank and the Group. In 2023, employee volunteers took care of the needs of the Earth, putting eco-values first. The Foundation has committed to the goal of raising environmental awareness and promoting ecological values such as: separation of waste, increasing the number of plants in our spaces, protecting animals and forests, and raising environmental awareness among the public.

The program is divided into two interdependent parts: sports challenge and eco-volunteering.

The sports part of the campaign was based on engaging employee volunteers in sports activities. Each kilometer covered and calorie burned contributed to the stated goal of donating 250,000 PLN to the Bank Millennium Foundation. 1,508 volunteers became involved in the activities, traveling a total of 311,444 kilometers and burning 18 million calories between 24 April and 25 June 2023. The campaign not only promoted ecological values, but also encouraged a healthy lifestyle with intensive physical activity, which in turn benefits not only our health and well-being, but also the environment. To achieve their exercise goals, our volunteers gave up driving or taking public transportation and instead walked, ran, or biked. As a result, we saved 71 tons of carbon dioxide.

As part of the second part of the campaign, **26 different eco-initiatives were implemented** thanks to the amount donated to the Foundation. The eco-volunteerism collectively engaged **125 volunteers**. The eco-initiatives required volunteers to: be engaged in their work, be open to the local communities, plan for the long-term impact of their pro-environmental activities, use raw and recycled materials, and minimize purchases. The campaign created an ideal space for creative and, importantly, charitable ideas. As a result, each of the initiatives was unique.

For the Our People'23: Save the Planet grant program, the Bank Millennium Foundation has allocated more than PLN 250,000.

3.8.3. PATRONAGE OF CULTURE

For more than 30 years, cultural involvement has been an important part of Bank Millennium's social activities. The Bank supports cultural undertakings with a national and local range alike. It is a 360° patron of culture, promoting art in nearly all its manifestations, including music, painting, sculpture, film, theater, photography, literature and performance. Its supports niche and popular culture. Its assumption is to be a long-term partner. For 18 years, it has been a patron of the Millennium Docs Against Gravity festival, the largest film festival in Poland, for over 20 years, it has sponsored the International Festival of Traditional Jazz "Old Jazz Meeting Złota Tarka", and it has also been a long-time sponsor of the Lidzbark Humor and Satire Nights, one of the most important Polish cabaret events. For 17 years, the Bank funded the Golden Scepter award for outstanding creators of culture, for 11 years, the Bank was the patron of the "Millennium Pearls" ("Perty Millennium") joint program of Bank Millennium and Polish TV (TVP), whose purpose was to produce, promote and present artistic events in the high art realm on Polish TV. It has also sponsored the Sacrum Profanum contemporary music festival, the Bella Skyway Festival - a multimedia show prepared by an international group of

artists, the “Two Theaters” Festival, the Gdańsk Music Festival, the Mozart Festival in the Warsaw Chamber Opera, and many other events. In 2022, the Bank took the patronage of the exhibition of the works of Polish photographers arranged under the name “Solidarity”, showing the drama of refugees from the war-torn Ukraine and the extraordinary solidarity of Polish people towards them. The exhibition was shown in Gdańsk, Warsaw and Chełm.

In 2023, Bank Millennium became a partner of the Inside Seaside festival, a new event on the Polish music scene. The Inside Seaside Festival is an important new cultural event with a good and diverse musical program and accompanying events for music lovers from all over Poland. The organizers chose a new formula and an unusual date for music festivals, filling a gap in the Polish music market.

In addition, the Bank once again took patronage of the “Cultural Start-up.” This is an initiative of the city of Gliwice, which supports innovative ideas, unique events and art at the highest level. This is a proprietary program of the Victoria Cultural Center in Gliwice addressed to organizations, artists, animators, organizers of events and workshops - both professionals and amateurs - who have something unique to offer in the field of culture and art.

Millennium Docs Against Gravity Film Festival

The most important cultural project endorsed by the Bank is the Millennium Docs Against Gravity festival. It is the largest film festival in Poland and a major documentary film festival in the world. Bank Millennium has been a partner of the festival for 18 years, and is also the founder of the festival's grand prize.

In May 2023, the round 20th edition of the Millennium Docs Against Gravity festival took place, once again in the hybrid formula. The festival presented 190 of the best documentaries from around the world, both short and feature-length. They were accompanied by meetings with artists and protagonists and debates on important issues addressed on screen. Like every year, the festival touched on a number of important issues - from ecology, through diversity, politics, psychology, human rights, art, pop-culture, to family relations. The festival was held in eight cities and online on the festival's platform for the first time. The 20th edition of the Millennium Docs Against Gravity festival was attended by over 144 thousand people.

The Millennium Docs Against Gravity Film Festival is the biggest celebration of documentary cinema in Poland and its popularity is growing every year. The authors of the festival, as well as its patron - Bank Millennium - want to bring knowledge about the modern world to as many people as possible. The festival's presence in multiple cities and, starting in 2020, online, allows the best documentaries from around the world to reach a wide audience. Thanks to that Millennium Docs Against Gravity achieves its main goals - film and social education, bringing audiovisual culture to a wide audience, not only in big cities, but also in smaller centers.

3.8.4. SUPPORTING EDUCATION - COOPERATION WITH FINANCIAL INSTITUTIONS

[GRI 203-1] A permanent feature of the activities aimed at supporting students and graduates is support for educational activities through the active participation of the Bank employees in workshops, conferences or debates.

In 2023, the Bank continued its cooperation with the Warsaw School of Economics, supporting it in improving the quality of its infrastructure, as well as students and graduates in developing their competencies and interests. An example of long-time cooperation is the coworking center established by Bank Millennium and the Warsaw School of Economics. It is free-of-charge space for meetings, networking, consultations with business theoreticians and practitioners. The coworking center constantly serves students and graduates who have founded or are planning to found their own startup

and want to bump their ideas up to business reality. Since 2017, the Bank has been a member of the **Warsaw School of Economics' Partners Club** and closely cooperates with this educational institution by playing an active role in academic life. Bank representatives take part in meetings with the Council of the Warsaw School of Economics' Partners Club during which elements of the WSE's strategy and the possibilities of educating students on key competences are discussed.

The Bank is committed to developing future leaders of the banking industry and is helping students to develop their skills. As part of the cooperation with the university, a representative of the bank acted as a speaker, focusing on the practical aspect of corporate banking. The event was attended by students from the SGH Banking SKN, who are preparing for careers in corporate banking. The lecture was also an opportunity for an inspiring exchange of views between the generations.

Continuing the educational partnership with the psychology and computer science major at the SWPS University of Social Sciences and Humanities, the Bank introduced students to practical solutions in the User Experience area. This type of collaboration makes it possible to share expertise, better prepare professionals for work and actively promote career opportunities at the Bank.

Once again, the Bank was a partner in this year's edition of "Economic Bridges", a nationwide project run by the SGH Student Union and the Forum of Economic Universities. The main goal of the project is to integrate the academic communities of business schools in Warsaw, Kraków, Wrocław, Katowice and Poznań and to build partnership relations between academia and business. The projects offers students an opportunity to participate in workshops, case studies, inspiring lectures and to meet with business people with an extensive track record.

In December 2023, Bank Millennium and Kozminski University entered into a strategic partnership based on the joint implementation of socially significant projects that will affect the future of education. The cooperation agreement was signed by Joao Bras Jorge - Chairman of the Bank Millennium Management Board, and prof. Grzegorz Mazurek, Rector of the Kozminski University. At the same time, the Bank has joined the ranks of donors of the first endowment capital in the Polish academic community, which allows financing the development of young generations, academic staff and scientific research. The strategic partnership is a unique form of cooperation in which the parties provide each other with material support, implement joint communication and educational initiatives, and one of the university's lecture halls will be branded with the Bank Millennium logo, reminding students and listeners of the bank's close support.

Bank Millennium was a sponsor of the IT Azure Summit 2023, the largest Polish conference devoted to the Microsoft Azure computing cloud. The Bank's representative gave a lecture on facts and myths of the Azure Landing Zone.

In May, Bank Millennium participated in Javeloper2023, the largest Polish conference on Java and software architecture. The event was addressed at architects, developers, devops, security, cloud and big data specialists and gathered more than 1,500 participants online. A representative of the Bank gave a presentation on Vavr - enhanced functional programming capabilities in JAVA.

As part of the internship program targeted at students and graduates of institutions of higher education, interns were offered the opportunity to develop their knowledge and skills in such fields as IT, HR, finance, risks, marketing, project management and electronic banking. In 2023, the summer internship program was expanded to include internship opportunities not only in Warsaw, but also in Wrocław, Gdańsk, Kraków and Katowice. The interns were invited to participate in training on soft skills and agile methodologies used at Bank Millennium.

3.8.5. SUPPORTING DIVERSITY

European Diversity Leader

The Bank is a signatory to the Diversity Charter and takes steps to support diversity within the banking community and outside the organization. The Bank has received the title of “European Diversity Leader 2024” from Financial Times. The ranking was based on feedback from more than 100,000 European employees and human resources and recruitment experts. The research firm Statista is a substantive partner of the project.

The surveys gave employees the opportunity to rate their employers’ diversity practices and to share their perceptions of the practices of other leading employers in the industries they represented. This year, the ranking’s authors added three new indicators to the analysis: the percentage of women in management positions (such as executive committees, management boards, supervisory boards), diversity-related communication, and the diversity score calculated by the data provider. The idea was to make the results of the ranking more reflective of the reality experienced by employees. Employee surveys now account for 70 percent of a company’s final score, and these new indicators account for up to 30 percent of the overall score.

The “European Diversity Leaders 2024” ranking presents a list of 850 companies with the highest scores in the survey. Bank Millennium was ranked 262nd with an index of 73.36 points. Bank Millennium is ranked sixth among Polish companies, but in the context of the domestic banking sector it achieved the highest score.

DIVERSITY IS OK!

This is an initiative, in which we want to ensure that every person in the organization feels important and needed. We pay attention to gender, age, salary, well-being at work, building relationships through proper communication, dysfunction, international culture. We want to make sure that what makes us different unites us and creates synergy in the workplace.

Since March 2023, we have organized webinars on Body Positivity, Gender Equality, Gender Pay Gap, Communication in Multigenerational Teams, Feminatives, and She and He in Business - Synergy Effect.

This year we are starting with topics on disability, communication and working in cross-cultural teams.

We are open to topics that employees want to discuss in order to spread a positive attitude towards diversity and openness to the fact that we are all different. At the same time, we want to foster empathy and understanding for each other, despite differences within teams, to make working together effective.

Support for female Paralympic athletes

In 2023, Bank Millennium again supported Paralympic athletes as part of the #CorinneRunsForGood campaign, thereby helping them continue their strive for achievements in sports and personal lives. For the third time, as part of Bank Millennium’s support for Paralympic athletes, Bank Millennium funded a scholarship for one of them. The bank contributed to the fundraising campaign for this purpose, working with Martyna Wojciechowska’s Unaweza Foundation and the #CorinneRunsForGood campaign.

Millennium Docs Against Gravity Film Festival

The 20th anniversary edition of MDAG took place from 12 to 21 May 2023 in cinemas in eight Polish cities: Warsaw, Wrocław, Gdynia, Poznań, Katowice, Łódź, Bydgoszcz and Lublin, and online - from 23 May to 4 June 2023 on the mdag.pl platform. Bank Millennium has been a sponsor of the Millennium Docs Against Gravity Festival and has financed the main prize since 2006. This year's edition of MDAG attracted 6,000 more people to arthouse cinemas and the website than it did in 2022. The festival continues to grow in popularity, with a total of 144,483 people participating in both parts of the festival. Nearly 190 of the best documentaries from around the world were presented, both short and feature-length. The festival was accompanied by dozens of additional events held in theaters and online. Workshops, discussions and psychological support as part of the Safe Space, inclusive language workshops, a VR section and exhibitions of posters and drawings in the festival cinemas were just some of the new features presented during the 20th edition of the festival. Every year, an important part of the Millennium Docs Against Gravity program are films devoted to ecology in the "Climate for Change" section, as well as films focused on queer and LGBTQ+ issues. This year, MDAG opened the Pride Month with a discussion associated with the WE'RE HERE, WE'RE QUEER section, which explores the lives of LGBTQ+ people in different parts of the world through documentary films.

In order to enable the broadest possible audience to participate in the Festival, in particular by including blind and visually impaired people, seniors, viewers with dyslexia and intellectual disabilities, selected films and screenings were projected during the festival with subtitles for the deaf and with the option of a verbal description of the visual content over headphones.



4. GOVERNANCE

MANAGEMENT

4.1. APPLICATION OF CORPORATE GOVERNANCE PRINCIPLES

The Bank operates on the basis of good practices in the ESG (Environmental, Social, Governance) area and complies with the principles of corporate governance. The company is listed in WIG-ESG - the WSE's index of socially responsible companies - and has been reporting on issues relating to running a responsible business for several years.

Best Practice for Listed Companies

On 29 March 2021 the Supervisory Board of the Warsaw Stock Exchange adopted new corporate governance rules for companies listed on the WSE Main List - "Best Practice for GPW Listed Companies 2021" (hereinafter referred to also as 'Best Practice 2021', 'BPLC2021'). Best Practice 2021 replace the previous document, in force since 2016, reflecting current trends in corporate governance. Best Practices 2021 entered into force on 1 July 2021, and the deadline for submitting the first report on their use was set for July 31, 2021.

As in previous years, in 2023 the Bank guided by the principle of transparency of its actions in shaping corporate and investor relations, as well as the highest quality of communication with shareholders, the Bank complied with the principles of Best Practice. The confirmation of employing the recommendations contained in Best Practice is the document "A statement on the company's compliance with the corporate governance recommendations and principles contained in Best Practice for GPW Listed Companies" published on the Bank's website.

As regards recommendation IV.R.2 item 2 and 3, regarding ensuring for the shareholders the opportunity to participate in a General Meeting of Shareholders (hereinafter, also 'General Meeting' or 'GM') with the use of real-time two-way electronic communication where shareholders may address

a General Meeting of Shareholders from a location other than the General Meeting and exercise, in person or through a plenipotentiary, their voting rights in the course of the General Meeting - in the Bank's opinion - the implementation of this rule during a General Meeting carries technical and legal risks to the correct and efficient conducting of a General Meeting. Avoiding these risks constitutes a bigger value for the shareholders than the implementation of the rule from part IV, Recommendation IV.R.2, item 2 of Best Practice. The Bank, ever since 2008, has been providing real-time online broadcasts of the proceedings of General Meetings, in accordance with the requirement specified in part IV, Recommendation IV.R.2 item 1 of Best Practice. At the same time, the Bank, within implementing Best Practice 2021, provided shareholders with a technical possibility of real-time, two-way communication during the proceedings of General Meeting.

Principles of Corporate Governance for Supervised Institutions

As a financial institution, the Bank since the beginning of 2015 has also been subject to the "Corporate Governance Principles for Supervised Institutions".

The Bank's Management Board and the Supervisory Board took resolutions on the application of the Principles, with the exception of § 16 sect. 1 and § 24 sect. 1, concerning the holding of meetings of the Bank's governing bodies (Management Board and Supervisory Board) in the Polish language.

The knowledge of the English language by members of the Management Board enables full mutual understanding and a proper level of communication during meetings. Moreover, the practically implemented principle of holding meetings of the Supervisory Board both in Polish and in English, with the assurance of essential assistance of an interpreter, also ensures mutual understanding and a proper level of communication.

The Supervisory Board assessed that the solutions and mechanisms used at the Bank to implement and execute the Principles satisfactorily take into account the objectives set out in the Principles in connection with the needs for optimal organization of the Bank's activities.

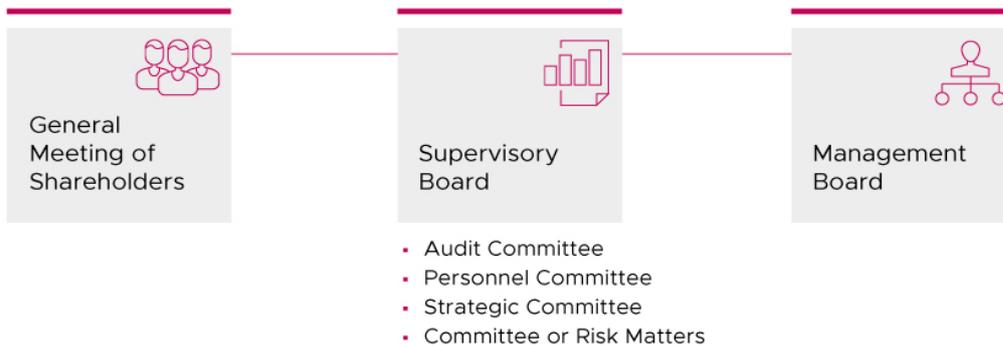
Recommendation Z

As an entity supervised by the KNF, the Bank has also aligned its activities with the internal governance principles described by the KNF in Recommendation Z, the current version of which came into force on 1 January 2022.

The Supervisory Board assesses that the Bank implemented the principles arising from Recommendation Z to a satisfactory extent, taking into account the changing internal situation and environment of the Bank.

4.2. GOVERNANCE STRUCTURE

[GRI 2-9] According to the Articles of Association of Bank Millennium, the Bank's authorities are the General Shareholders' Meeting, the Supervisory Board and the Management Board.



General Shareholders' Meeting

General Shareholders' Meeting - inter alia considers and approves financial statements and reports on the activities of the Bank and the Bank's Capital Group, adopts resolutions on the distribution of profits or coverage of losses, discharges Members of the Bank's governing bodies from the performance of their duties, elects and dismisses Members of the Supervisory Board and determines their remuneration, adopts resolutions giving opinions on the Supervisory Board's remuneration report.

Supervisory Board

The Supervisory Board exercises supervision over activity of the Bank, including, as regards operation of risk management and internal control systems. It also determines the number of Members of the Bank's Management Board, appoints and dismisses the Chairman, Deputy Chairmen and other Members of the Bank's Management Board, and determines their remuneration.

The Supervisory Board may set up **standing or ad hoc committees**, comprising Supervisory Board Members for performing specified supervisory tasks. **Standing committees of the Supervisory Board are: Audit Committee, Personnel Committee, Strategic Committee and Committee for Risk Matters.** Most Members of the Audit Committee, including its Chairman, are independent in the meaning of the Act on statutory auditors, audit firms and public supervision. The Supervisory Board consists of **12 Members (9 men and 3 women)**. **Seven Members of the Supervisory Board, including its Chairman, are Polish citizens.** **Seven Members of the Supervisory Board are not connected with a shareholder holding at least 5% of the Bank's shares.** The term of office of the Supervisory Board is 3 full financial years.

[GRI 2-9]

Composition of the Supervisory Board of Bank Millennium

	Function	Term
Bogusław Kott	Chairman of the Supervisory Board	3-year term; appointment on 24.03.2021
Nuno Manuel da Silva Amado	Deputy Chairman of the Supervisory Board	3-year term; appointment on 24.03.2021
Dariusz Rosati	Deputy Chairman and Secretary of the Supervisory Board	3-year term; appointment on 24.03.2021
Miguel de Campos Pereira de Bragança	Member of the Supervisory Board	3-year term; appointment on 24.03.2021
Olga Grygier-Siddons	Member of the Supervisory Board	3-year term; appointment on 24.03.2021
Anna Jakubowski	Member of the Supervisory Board	3-year term; appointment on 24.03.2021
Grzegorz Jędryś	Member of the Supervisory Board	3-year term; appointment on 24.03.2021
Alojzy Nowak	Member of the Supervisory Board	3-year term; appointment on 24.03.2021
José Miguel Bensliman Schorcht da Silva Pessanha	Member of the Supervisory Board	3-year term; appointment on 24.03.2021
Miguel Maya Dias Pinheiro	Member of the Supervisory Board	3-year term; appointment on 24.03.2021
Beata Stelmach	Member of the Supervisory Board	3-year term; appointment on 24.03.2021
Lingjiang Xu	Member of the Supervisory Board	3-year term; appointment on 24.03.2021

[GRI 405-1] Supervisory Board of Bank Millennium by gender

	Men	Women	Total
	9 (75%)	3 (25%)	12 (100%)

[GRI 405-1] Supervisory Board of Bank Millennium by age group

	Men	Women	Total
[30-50]	0 (0%)	0 (0%)	0 (0%)
≥50	9 (75%)	3 (25%)	12 (100%)
Total	9 (75%)	3 (25%)	12 (100%)

[GRI 2-9] A description of the competences relevant, inter alia, from the point of view of managing the economic, environmental and social impact of the company, and information on other functions performed by Members of the Bank's Supervisory Board are available, in relation to each of these persons, on the Bank's website:

<https://www.bankmillennium.pl/en/about-the-bank/corporate-bodies-and-governance/supervisory-board>

[GRI 2-11] In 2023, the Chairman of the Supervisory Board did not hold any managerial or supervisory function in the Bank Millennium Group. However, he was Member of the Bank Millennium Foundation Board (hereinafter referred to as Foundation). The founder of the Bank Millennium Foundation is the Bank, while pursuant to its Articles of Association the Foundation does not conduct business activity.

Management Board

[GRI 2-9] The Bank's Management Board manages the overall activity of the Bank and represents it externally. Based on the fundamental organisational structure approved by the Supervisory Board, the Management Board defines the detailed organigramme of the Bank. The Management Board defines the principles of functioning and organization of work at the Bank as well as the principles of its HR policy. In addition, the competences of the Management Board include, inter alia, preparation and submission to the Supervisory Board and the General Shareholders' Meeting reports and other documents concerning the Bank's operation, convening the General Shareholders' Meeting, establishing internal bank regulations, appointment of committees authorized to constantly monitor specific matters. The Management Board of the Bank consists of **7 Members. Four Members of the Management Board are Polish citizens.** The term of office of the Management Board lasts 3 full financial years.

Composition of the Management Board of Bank Millennium	Function	Term
Joao Nuno Bras Jorge	Chairman of the Management Board	3-year term; appointment on 24.03.2021
Fernando Maria Cardoso Rodrigues Bicho	Deputy Chairman of the Management Board	3-year term; appointment on 24.03.2021
Wojciech Haase	Member of the Management Board	3-year term; appointment on 24.03.2021
Andrzej Gliński	Member of the Management Board	3-year term; appointment on 24.03.2021
Wojciech Rybak	Member of the Management Board	3-year term; appointment on 24.03.2021
António Ferreira Pinto Júnior	Member of the Management Board	3-year term; appointment on 24.03.2021

[GRI 405-1] Management Board of Bank Millennium by gender	Men	Women	Total
	7 (100%)	0 (0%)	7 (100%)

[GRI 405-1] Management Board of Bank Millennium by age group	Men	Women	Total
[30-50]	0 (0%)	0 (0%)	0 (0%)
≥50	7 (100%)	0 (0%)	7 (100%)
Total	7 (100%)	0 (0%)	7 (100%)

[GRI 2-9] A description of the competences relevant, inter alia, from the point of view of managing the economic, environmental and social impact of the company and information on other functions performed by Members of the Bank's Management Board are available, in relation to each of these persons, on the Bank's website:

<https://www.bankmillennium.pl/en/about-the-bank/corporate-bodies-and-governance/management-board>

As part of the management structure, the Chairman of the Bank's Management Board is responsible for supervising the area of sustainable development.

[GRI 2-11] In 2023, the Chairman of the Management Board of Bank Millennium was the Chairman of the Supervisory Boards of the following subsidiaries of the Bank Millennium Group: Millennium Leasing and Millennium Goodie (in each of them Bank Millennium held a 100% share in the capital). Performance of these functions enables to exercise ownership supervision over the activities of the above subsidiaries. These subsidiaries materially supplement the banking services provided by Bank Millennium and make an important component of the Group's financial offer.

Apart from performance of supervisory functions in the above subsidiaries, the Chairman of the Management Board of Bank Millennium was the Deputy Chairman of the Supervisory Board of the Bank Millennium Foundation.

Bank's Committees

The following Committees operate in the Bank:

- Commercial Committee
- Credit Committee
- Risk Committee
- Capital, Assets and Liabilities Committee
- Processes and Operational Risk Committee
- Investments and Costs Committee
- Liabilities at-Risk Committee
- IT Steering Committee
- Personnel Committee
- Validation Committee
- AML Committee
- Product Committee
- Sustainability Committee

Chairman of the Management Board of the Bank is the Chairman of the Sustainability Committee. The Committee comprises all Members of the Bank Management Board as well as representatives of units performing tasks related to sustainable development in the Bank and the Bank's Capital Group. Meetings of the Committee are held not less often than once a quarter. The scope of the Committee's tasks includes recommending a sustainable development strategy to the Bank's Management Board, adopting operational plans related to the implementation of this strategy and monitoring the

implementation of planned activities, assessing the impact of sustainability principles on the Bank's operations, approving and monitoring KPIs and KRIs in the area of sustainable development, providing the Bank's Management Board with periodic information on key aspects related to sustainable development.

Management structure in the Bank's Subsidiaries

The entire Management Board of Bank Millennium sits on the Supervisory Boards of the following subsidiaries: Millennium Leasing Sp. z o.o. and Millennium Goodie sp. z o.o. In the Supervisory Boards of other Bank Millennium subsidiaries, Members of the Bank's Management Board constitute the majority of the Supervisory Board, with the exception of a new company in the Group's structure - Millennium Financial Services sp. z o.o., which does not have a supervisory board. Additionally, in the case of Millennium Bank Hipoteczny S.A. (apart from 4 Members of the Management Board of Bank Millennium S.A.), the Supervisory Board in accordance with the law consists of independent members.

Pursuant to the Act on covered bonds and mortgage banks, at each mortgage bank, on the request of the supervisory board of such bank, the Polish Financial Supervision Authority appoints a trustee and at least one deputy trustee. On 20 May 2021, the Polish Financial Supervision Authority, at the request of the Supervisory Board of Millennium Bank Hipoteczny, appointed a Trustee and Deputy Trustee at Millennium Bank Hipoteczny.

4.3. MANAGEMENT APPROACH TO SUSTAINABLE DEVELOPMENT

The basis for defining the approach to managing sustainable development is an **agenda formulated by the United Nations that includes 17 goals, 169 targets, and 304 indicators. Bank Millennium signed a declaration regarding the implementation of the UN Sustainable Development Goals in 2017.**

The Bank is guided by all 17 goals, but the following goals receive the highest attention:

- 3.**
Good health and well-being
- 4.**
Quality education
- 5.**
Gender equality
- 8.**
Decent work and economic growth
- 9.**
Industry, innovation and infrastructure
- 13.**
Climate action
- 17.**
Partnering for the goals



As of 2018, the Bank is a signatory to the **Diversity Charter**. The Charter is a pledge signed by organizations that choose to prohibit discrimination in the workplace and work to create and promote diversity.

In Bank Millennium, actions towards sustainable development are an integral part of the business strategy. The ESG area is also included in the Group’s new strategy for 2022-2024, adopted by the Management Board and approved by the Supervisory Board, and in the ESG Strategy adopted by the Management Board and published in 2022. This issue is discussed in detail in Section 1.4 of this report (“ESG is an integral part of the new strategy for 2022-2024”).

Bank Millennium’s priority is to provide the highest quality of client service, conduct ethical marketing and sales and facilitate the utilization of banking and non-banking services (e.g. e-administration) by introducing facilities for people with disabilities and innovative services. Also employees are the recipients of ESG activities. In addition to ensuring stable and attractive working conditions and offering an opportunity to get involved in social activities the Bank promotes diversity in the

organization. Social programs are run through the Bank Millennium Foundation and focus primarily on financial education and development of employee volunteerism.

The Bank also attaches great importance to environmental and climate protection issues and carries out its activities in the spirit of the strategy formulated by the European Union and its member states. The Bank has defined its approach to these issues in the "Environmental Policy of the Bank Millennium Group". These issues are discussed in detail in chapter 2.1. "Managing Environmental Impacts and Climate Protection".

Organization of the ESG area management process

[GRI 2-12, 2-13] The Bank's Management Board is responsible for effective management of the sustainable development area in the Bank in respect to environmental, social and corporate governance issues, while the Bank's Supervisory Board oversees this process.

Within the Management Board, the sustainability area is supervised by the President of the Management Board, while ESG risk management is supervised by the Bank's Management Board Member responsible for Risk.

The Management Board is provided with ample information and reports to enable the exercise of control over processes aimed at determining and managing the organization's economic, environmental and social impact, including periodic reports on all key aspects of the Bank's business. To this end, the Management Board's control activities are also carried out by committees established within the Bank's structures. In this process, information obtained from the Bank's stakeholders is also taken into consideration, such as that regarding employee matters or issues arising from complaints or customer service surveys. For instance, the Process and Operational Risk Committee prepares reports on client complaints and actions taken by the Bank on issues identified in the complaint handling process and reports on the quality of the customer service process and studies of client needs. A key role in these endeavors is also played by the Sustainable Development Committee whose activities have been described later in this section.

The Supervisory Board also receives, in some instances through its committees, information on key aspects of the Bank's business, including aspects related to its economic, environmental and social impact. For example, the Audit Committee analyses issues related to the complaint process and actions taken by the Bank in relation to issues identified in this process. The Supervisory Board Risk Committee accepts information on risk appetite metrics, including those related to the ESG area. Moreover, a global assessment of the Bank's activities, including the management of economic, environmental and social issues, is performed by the Supervisory Board based on the Bank's reports published annually. They are analyzed and presented at the Shareholder Meeting and form the basis for granting a discharge to the Bank's Management Board on the performance of its duties in a given financial year.

[GRI 2-17] Members of the Management Board and Supervisory Board of the Bank and the Bank Millennium subsidiaries are covered by trainings adequate to their roles, knowledge and experience. These trainings are also designed to increase their knowledge, skills and experience related to sustainable development.

Bearing in mind the growing significance of sustainable development for the Bank Millennium Group's business, in 2021 the Bank established within its structures the Sustainability Committee and the Sustainability Office, which was then, in accordance with the resolution of the Management Board adopted in December 2023, transformed into the Sustainability Department.

The Sustainability Committee is chaired by the President of the Bank's Management Board. The Committee is composed of all members of the Bank's Management Board, as well as representatives of the units performing tasks related to sustainable development in the Bank and the Bank's Group. The Committee meetings are held not less frequently than once a quarter. The Committee's tasks

include recommending a sustainable development strategy to the Bank's Management Board, adopting operational plans related to the implementation of this strategy and monitoring the implementation of the planned actions, evaluating the impact of sustainable development principles on the Bank's activity, approving and monitoring KPIs and KRIs in the area of sustainable development, providing the Bank's Management Board with periodic information on key aspects of sustainable development.

A Sustainability Department is supervised directly by the President of the Bank's Management Board. The purpose of the Department is to supervise and coordinate the implementation of sustainable development principles in the Bank and the Bank's Group. The scope of the Department's tasks includes, among others: coordination of work related to the sustainable development strategy, cooperation with other units of the Bank and entities of the Bank's Group in the implementation of the sustainable development principles, ensuring identification of risks related to climate change in the Bank's operations, cooperation with other units of the Bank in the implementation of sustainable products, conducting activities aimed at promoting sustainable development principles among the Bank's employees.

Sustainability activities in the respective reporting areas are the responsibility of the individual units of the Bank and the Bank's Group in accordance with their areas of responsibility, forming an integral part of the business, and distinct areas of activity are assigned to employees holding senior management positions (those reporting directly to the President of the Management Board or members of the Management Board of either the Bank or the pertinent Group companies).

Adverse impact mitigation processes

[GRI 2-25] Considering the issue of the adverse impact of the Bank Millennium Group's operations on the environment, we primarily focus on the impact caused by the Group's operating activity, resulting in the consumption of resources and generation of waste or greenhouse gas emissions that are specific to the banking business. In this context, among other initiatives, we have undertaken to take actions aimed at reducing our carbon footprint. These commitments are included in the ESG Strategy for 2022-2024 and cover, among others: reduction by 50% of own greenhouse gas emissions in 2022 compared to 2020, achieving climate neutrality in relation to own emissions (by 2027) and full climate neutrality (by 2050).

Employees of the Group's companies are also encouraged to bring to management's attention other potential areas of the Group's adverse impact, in particular those identified by handling complaints reported by customers. Our commitments in this respect involve the roll-out of targeted actions in response to the issues brought to our attention by these stakeholders.

The Bank has an effective process in place for handling complaints reported by clients. Such reporting may take any form that is convenient to clients: by mail, by phone, via a message sent through the Bank's online system or in person at any branch. The Customer Relations Unit, is responsible for handling customer complaints. The staff of this department scrutinize every reported problem and prepare a comprehensive response for the customer. In examining a complaint, the Bank strives to get to the bottom of the issue and propose a solution tailored to the situation of the respective client. Our priority in communication with customers is to convey a comprehensible, transparent and friendly message, which is why we follow the plain language policy.

Moreover, our Customer Relations Unit examines complaints and comments submitted by clients using all available communication channels, including those reported directly to the Bank's Management Board or to the Bank's Spokesperson.

The fundamental principle applied to the handling of customer complaints is openness to working out an arrangement with the client, which may, for instance, be applied in mediation proceedings conducted before the Financial Ombudsman or a banking arbitrator.

In each and every instance when the client's claims are rejected, the Bank informs the client about the available paths of appealing against the decision.

The Customer Relations Unit is expected to identify areas that may exert an adverse impact on clients, analyze such information and forward it to the pertinent units within the Bank's or the Group's structures. Moreover, the Customer Relations Unit prepares proposals for changes in the Bank's products, services or processes with a view to reducing the number of complaints or eradicating their causes. We have been pursuing this objective continuously for several years under a program dubbed the Voice of Customer.

The Bank's complaint handling process is subject to a monthly survey designed to monitor the degree of customer satisfaction and contentment with distinct aspects of the complaint process. The survey is conducted in the form of a survey containing open and closed-ended questions. In a regular monthly survey, we ask a randomly selected sample of customers to share their opinions with us. According to the average outcome of the satisfaction survey conducted in 2023, over 85% of our customers are satisfied or very satisfied with the complaint process. We also conduct ad hoc surveys used to collect information from clients, regarding selected aspects of the process. For instance, we analyze the satisfaction of clients making complaints about Profit Savings Accounts. For such customers we have a dedicated program Close The Loop 2.0. Its aim is to use the customer's feedback to improve the products and services provided by the Bank and thereby increase customer satisfaction.

A regular in-depth analysis of the survey results translates directly into changes in the complaint process, such as reducing the time necessary for the handling of complaints or changing the method of communication on various issues. We pay particular attention to the comments of those customers who are very critical of our complaint process. We have a dedicated Close The Loop 2.0 program for such clients. Its goal is to use the Customer's feedback to improve the products and services provided by the Bank and thus increase Customer satisfaction.

We also monitor the effectiveness of the complaint process on a quarterly basis by applying dedicated key performance indicators (KPIs) and key risk indicators (KRIs). Whenever significant deviations of such indicators from acceptable levels are identified, we carry out additional analyses and, on an as-needed basis, plan and take pertinent remedial actions.

The Bank also has a process in place that enables each employee to report any behavior they perceived as concerning, especially from the ethical viewpoint. This process is described in more detail in section 4.8.5 "Mechanisms for requesting advice and reporting potential irregularities".

Confirmation of the quality of conducted activities in market assessments

The Bank's adherence to sustainable development principles has been confirmed by external assessments. Since 2010, the Bank has been included in the Warsaw Stock Exchange's index composed of companies fulfilling the highest standards of corporate social responsibility. In 2010-2019, the Bank was included in the Respect Index, and since 2019 it has been incorporated in the WIG-ESG index, which is created by attaching additional weights to companies in the form of an ESG (Environmental, Social and Governance) rating provided by the global ratings firm Sustainalytics and by conducting a corporate governance assessment by the Warsaw Stock Exchange.

Bank Millennium has an ESG rating of "A" by MSCI and "Medium Risk" by Sustainalytics.

In 2023, the Bank was once again awarded the CSR Gold Leaf, the highest category of distinction in the Polityka weekly ranking. Bank Millennium was also included in the Financial Times' "European Diversity Leaders" ranking. This is a list of European companies prepared periodically by the elite business and financial daily in cooperation with the research company Statista. It also received the title of European Climate Leader in a ranking also compiled by the Financial Times and Statista. Bank Millennium was also included in the first edition of the World's Most Trustworthy Companies 2023, organized by Newsweek and Statista.

4.4. RISK MANAGEMENT

The mission of risk management in the Bank Millennium Group is to ensure that all types of risks, financial and non-financial, are managed, monitored, and controlled as required for the risk profile (risk appetite), nature and scale of the Group's operations.

The goals of the risk management mission are achieved through implementation of the following actions:

- Development of risk management strategies, credit policy, processes and procedures defining the principles for acceptance of the allowable level of particular types of risk,
- Increasingly wider implementation of the IT tools for risks identification, control, and measurement,
- Increasing awareness of employees as regards their responsibility for proper risk management at every level of the Group's organizational structure.

Detailed information on risk management (including the risk management and control model, the risk management process, the division of competences in the field of risk management, the adopted Risk Strategy, as well as the rules and policies in this area) have been published in the Management Board Report on the activity of Bank Millennium S.A. and Capital Group of Bank Millennium S.A. in 2023.

4.5. ETHICAL STANDARDS AND HUMAN RIGHTS

[GRI 3-3] The Bank Millennium Group has a system in place for managing ethics that consists of the following:

- **Code of Ethics** - lays down our ethical principles. The Compliance Department is responsible for articulating the principles described in the Code, communicating and evaluating the adherence to the principles of ethics;
- By its actions and conduct, the Bank's Management Board promotes high ethical and professional standards, including in particular an awareness of the importance of risk in the Bank's business and a risk culture;
- **Ethics Officer** - the function of the Ethics Officer is exercised by the head of the Compliance Department. The tasks of the Ethics Officer include safeguarding the compliance with the Code of Ethics, promoting and disseminating information about ethical standards, ordering inspections of compliance with ethical principles and verifying cases of their breach;
- **system for training in ethics** and notifying changes in the rules of ethics;
- **procedures, policies and rules** containing guidelines on proper conduct;
- **system for reporting breaches** of ethical standards, also anonymously;
- **rules of ethics compliance monitoring system** - the Compliance Department at least annually assesses the risks associated with ethics violations. A report from the assessment is drafted, which is presented to the Bank's Management Board. The Bank's Management Board periodically verifies and assesses compliance with the rules of ethics in order to adjust them to the changing internal situation in the bank and the bank's environment, and at least once a year informs the Supervisory Board about the results of the assessment.

The Code of Ethics contains principles and values that should guide employees in the performance of their duties and in their relations with their colleagues and with the Bank as an employer. The Code also sets out guidelines for relations with clients, the market and suppliers, referring to such areas as: respect for human rights, quality of service, ethical sales, fair competition and communication, focus on ensuring long-term continuity and sustainable development, principles for conducting business relations, anti-money laundering, anti-corruption, including rules on accepting and giving benefits, and participation in and organization of tenders. The Code of Ethics also applies to franchisees and employees at franchise locations.

Every employee is obligated to become familiar with the Code by completing a mandatory e-learning course, confirm their knowledge and apply the rules included in the Code in their daily work. Moreover, the Bank has appointed an Ethics Officer whose responsibilities include safeguarding compliance with the Code of Ethics, promoting and disseminating information about ethical standards, ordering inspections of compliance with ethical principles and verifying cases of their breach.

Notwithstanding the above, employees receive mandatory training in the area of managing conflicts of interest and information considered confidential. These materials are intended to sensitize employees on how to identify and handle situations, which in any way may cause a conflict between the interests of Bank Millennium and the client, as well as how to handle information, which is or may be price-sensitive and its disclosure could affect the price of financial instruments.

As part of such training, employees also learn what responsibilities (including legal orders and prohibitions) are associated with conflict situations and with coming into possession of price-sensitive information. The role of employees as those who must actively identify their own behavior as well as that of other employees and clients is highlighted in the examples.

All the above-mentioned training makes up a mandatory package of regulatory training that every Bank employee is required to undergo.

Trained on the Code of Ethics *	Bank Millennium			Bank Millennium Group		
	2023	2022	2021	2023	2022	2021
Managerial staff trained in the year	32	25	22	33	28	25
	2.7%	1.85%	2.29%	2.66%	1.93%	2.43%
Other employees trained in the year	909	1,320	1,064	949	1,422	1,108
	16.18%	19.20%	18.38%	16.27%	18.98%	18.25%
Total percentage of trained managers	95.44%	94.50%	94.09%	95.44%	94.33%	93.99%
Total percentage of trained other employees	97.51%	94.20%	93.10%	97.43%	94.09%	92.97%

* Number and % of persons trained on the Code of Ethics in the analyzed group (managerial staff and other employees). The training covers all persons employed in the Bank Millennium Group.

To ensure safety of the funds entrusted by clients, full information on the principles of operation of products and their advertising and sales **Millennium Towarzystwo Funduszy Inwestycyjnych**, apart from applying the Bank Millennium Group's Code of Ethics, also complies with the law binding on investment fund companies.

Employees have the possibility to report violations of ethical standards via email or postal mail (also anonymously). Whenever an irregularity is discovered in the business conduct of the Bank's employees (other than Management Board Members), it may be reported by e-mail to a dedicated address or by letter directly to the President of the Bank's Management Board (this channel ensures the anonymity of the reporting individual). As regards the identification of irregularities in the business conduct of the Bank's Management Board Members or Supervisory Board Members, the respective report should be made by letter directly to the Chairperson of the Audit Committee of the Bank's Supervisory Board.

In 2023, there were no reported breaches of the Bank's rules of ethics.

The issues concerning respecting human rights are described in the Bank Millennium Group's Code of Ethics, the diversity policy as well as in anti-discrimination and anti-mobbing procedures.

In 2022, the Bank adopted the "Bank Millennium S.A. Sustainability Policy" with the "Human Rights Principles" forming its integral part, as published on the Bank's website at (<https://www.bankmillennium.pl/o-banku/esg#zasady-esg>).

The Bank Millennium Group acts with respect for human dignity, opposes discriminatory practices and observes the right to equal treatment irrespective of gender, age, disability, race and ethnic origin, skin color, ancestry and territory of origin, religion, nationality, political beliefs, trade union membership, creed, sexual orientation, employment for a definite or indefinite period of time, full-time or part-time employment, and other premises, which expose an employee to discriminatory behaviors. Such information does not constitute a criterion for selecting employees, terminating their employment, setting terms and conditions of employment, promotion, or access to benefits or training to improve professional qualifications.

In the Bank Millennium Group, employees enjoy, among others, the right to information and consultation, social and housing assistance, good working conditions and access to health care. The Group's policies and the results of their application are described in the "Employees" section. The Human Rights Principles may be found at <https://www.bankmillennium.pl/o-banku/esg#zasady-esg> and in chapter 1.5 of this Report - „Approach to sustainable development”.

Every supplier taking part in a tender procedure must undertake to observe the rules included in the Bank Millennium Group's Code of Ethics, including the respect of human rights and compliance with anti-corruption policies, by signing a representation to that effect. A clause requiring compliance with the Code of Ethics is also included in contracts with suppliers.

In addition, Bank Millennium has provisions in its lending rules and regulations for corporate clients **requiring all clients to abide by the principles of environmental protection and respect for employment rules.** In addition, the rules and regulations contain certain restrictions regarding the financing of socially harmful activity featured on the EBRD Environmental and Social Exclusion List. Clients are obligated not to use funds from the loan in any way linked to the activities mentioned on the EBRD Environmental and Social Exclusion List.

4.6. THE BANK IN THE MARKET ENVIRONMENT

4.6.1. RELATIONS WITH THE CAPITAL MARKET

Communicating with the investors' community the Bank assures a high level of transparency and proper access to information for all its recipients. Accurate and up-to-date information is provided in keeping with relevant legal regulations. The list of information published by the Bank, defining the frequency and place of publication, is available on the Bank's website in the Investor Relations section - in section of Information Policy <https://www.bankmillennium.pl/en/about-the-bank/investor-relations/information-policy>.

The investor relations website <https://www.bankmillennium.pl/en/about-the-bank/investor-relations> always provides up-to-date information, including Bank Millennium share prices on the WSE, shareholding structure, details of General Meetings, dividend payment history or credit ratings. There are also current and periodic reports, financial results presentations, Excel sheets with key financial information and other important information about the Bank. It is worth noting that the website is responsive, which means that it is adapted to mobile devices - tablets and smartphones.

The Bank uses various communication channels in order to reach the present and potential Shareholders, mainly such as:

- regular conferences with the participation of the Management Board on the quarterly performance of the Bank's Group (four in 2023),
- participation in conferences organized for investors in Poland and abroad (6)
- individual and group meetings with capital market players (307),
- current stock exchange reports (41) and press releases,
- dedicated website in the Bank's portal on investor relations,
- encouraging people to participate in the annual Shareholder Meeting,
- ongoing contacts with market participants (by e-mail or telephone).

In keeping with best practice on equal access to information from 2006 the Bank has been assuring unrestricted access to results conferences online with the Management Board (video streaming in Polish and in English) and by phone. A recording of each conference is available on the Bank's website. The Bank also provides video streaming of General Meetings. A recording of the deliberations and the resolutions adopted are also available on the website.

Bank Millennium is covered by 12 analysts representing local and international brokerage houses who publish their reports and recommendations for Bank Millennium shares. The full list can be found on the Bank's website <https://www.bankmillennium.pl/en/about-the-bank/investor-relations/analysts>.

As at 31 December 2023, the recommendation structure (not older than 6 months) was as follows:

Buy	Hold	Sell
4	2	1

4.6.2. COOPERATION WITH TRADE ORGANIZATIONS

[GRI 2-28] The Bank is a member of a number of industry organizations operating on a regional, national and international level. Some of them focus on the area of corporate business (Chambers of Commerce, Trade and Industry), others - on improving relations and knowledge of employees with specific competencies (Polish Chamber of Statutory Auditors or Institute of Internal Auditors). The most important industry organizations are: Polish Confederation Lewiatan (representing the interests of employers in Poland), Polish Association of Listed Companies, ACI Poland Financial Markets Association, Polish Association of Factors, Polish-Portuguese Chamber of Commerce, Polish Association of Developer Companies and the Polish Association of Capital Investors, Pomeranian Employers, Polish Business Council, SinoCham Polish-Chinese Main Chamber of Commerce, Chamber of Brokerage Houses.

The Bank is also a member of the **Polish Bank Association**, an organization associating and representing the interests of all banks operating in Poland. It helps banks and clients form the right relationships and optimal development. The Bank's specialists participate in the work on solving difficulties and issues specific to the whole sector, among others in the work of the Committee on the Quality of Financial Service and the Banking Cybersecurity Centre and Bank IT Security Incident Register, the Polish SWIFT and SEPA Users' Committee, the Real Estate Financing Committee, the Electronic Banking Council and the Bank Card Issuers' Council.

Millennium Leasing is a member of the Polish Leasing Association and Millennium TFI of the Chamber of Fund and Asset Management (IZFiA).

4.6.3. BUSINESS PARTNERS

Procurement policy

The Bank cooperates with many business partners as the buyer of products and services from various market segments. The key business partners render services associated with the lease of and support for branches and office space, services and purchase of IT equipment and security and marketing services.

The principles of cooperation with Bank Millennium's suppliers are described in the Instructions for selecting suppliers and making purchases. These instructions define, among other things, how the procurement process is organized, the role played by the various process participants and the supplier selection criteria. **Suppliers are selected in tenders, which allows the Bank to use objective selection criteria.** To ensure transparency of the procurement process, the substantive and commercial evaluations of bids are done by independent Bank units. The chief risk ensuing from inappropriate cooperation with suppliers involves a limitation on the ability to render banking services.

The Bank collaborates with brokers on the basis of agency agreements. Collaboration involves the Bank entrusting businesses to perform the activities prescribed by the agreement related to acting as an intermediary in the sales of mortgage products. Ordinarily, the agency agreements entered into by the Bank are outsourcing contracts. Some of the Bank's branches are operated under franchise agreements with entrepreneurs.

The Bank's Subsidiaries collaborate with business partners on the basis of agency cooperation agreements. These agreements are entered into with business entities or individuals working in a given organizational unit (Representatives).

Criteria for selecting suppliers

[GRI 3-3] The criteria for selecting suppliers in tender procedures include: good ratio of quality to cost of the services or products and the terms of delivery and payment. The bidder's substantive capabilities and financial reliability are also taken into account.

Geographical location of the suppliers is not one of the selection criteria. **In justified cases, the Bank also includes environmental and social factors among the aspects that affect its choice of suppliers.**

For purchases of goods used by the entire Group, the Bank's supplier selection policy is applied. Specific supplier selection criteria are employed by Subsidiaries if separate regulations require that, e.g. the ones governing the operations of funds and investment fund companies at Millennium TFI.

Ethical and environmental standards

[GRI 308-1, 414-1] The requirement to apply ethical and/or environmental clauses in agreements, where applicable, is an important element of the regulation pertaining to the procurement process (for example OHS regulations in the contracts for provision of construction or environmental services in agreements on waste disposal). [FS5] **Every supplier taking part in a tender procedure must undertake to observe the rules included in the Bank Millennium Group's Code of Ethics, including the respect of human rights and compliance with anti-corruption policies, by signing a representation to that effect.** In addition, a clause confirming supplier compliance with the Code of Ethics has been included in currently concluded supplier agreements. In 2022, the Bank developed the "Sustainability Guidelines for Suppliers" including, but not limited to, requirements for: employee rights; safety, prevention and health; environmental responsibility; and responsible management. All potential suppliers are required to sign declarations in which they undertake to comply with the Guidelines. Additionally, in its supplier selection process the Group uses the Sustainability Supplier Questionnaire.

The performance of agreements of significance to the Bank is monitored. The quality and timeliness of services and goods and financial standing of the suppliers are evaluated. In justified cases, audits are conducted in suppliers' offices to assess their security and continuity of their business activity. In 2023, the quantity and quality of goods and services supplied was monitored for approx. 1,780 agreements by the Bank.

In the case of 35 agreements, the suppliers' financial standing and their contingency plans were monitored. The quantity and quality of goods and services supplied was monitored for roughly 2,001 agreements by the Bank Millennium Group.

Products and services purchased	Bank Millennium			Bank Millennium Group		
	2023	2022	2021	2023	2022	2021
Number of suppliers*	4,876	4,961	4,310	10,903	11,047	11,502
[GRI 204-1]% of amounts paid to local suppliers**	94%	93%	95%	95%	93%	93%

*In the data for 2022, the number of suppliers was corrected (reduced) by 2,540 (recipients of payments for administrative proceedings) and similarly in 2021 by 2,329

** with registered offices in Poland

Invoice payment term	Bank Millennium			Bank Millennium Group		
	2023	2022	2023	2022	2023	2022
Up to 30 days	76%	74%	75%	84%	82%	83%
31-60 days	22%	23%	21%	14%	15%	14%
Over 60 days	2%	3%	4%	2%	3%	3%

Millennium TFI's partners

The activity of Millennium TFI and the funds it manages involves different types of business partners. These include: the transfer agent maintaining the participants' registers, the custodian of the funds' assets, the distributors of units, the entity maintaining the funds' books and calculating the value of the funds' assets, the providers of office, transport, legal and IT services, the entity maintaining the documents and the entity handling the circulation of correspondence, the entity maintaining the Company's books (Bank), banks and brokerage houses as business partners of the funds. The main categories of service providers to the Company and the funds are unit distributors, transfer agent, custodian of the funds' assets, the funds' business partners (banks and brokerage houses), legal advisors, financial auditors and IT service providers.

Agreements with Millennium TFI's suppliers are concluded, and the terms and conditions for the provision of services are defined, on the basis of legal regulations governing the activity of funds and fund management companies. To the extent not covered by the above regulations, the Company applies the Bank Millennium Group's Code of Ethics regulating the principles of establishing and maintaining relations with suppliers of goods and services.

The main criteria for selecting suppliers are set out in the regulations governing the activity of funds and investment fund companies. Due to different regulations concerning companies and banks, the criteria used by the Company may differ significantly from the criteria used by Bank Millennium. To the extent to which the Company employs group solutions for purchases of goods and services, the applied supplier selection policy is consistent with the principles laid down in the Bank Millennium Group's Code of Ethics.

[GRI FS5] The Society commits suppliers to ethical and environmental standards for group contracts, in accordance with the principles contained in the Bank Millennium Group Code of Ethics.

Millennium Leasing's partners - suppliers of leased assets

Millennium Leasing cooperates with suppliers of fixed assets, which are the subject of leasing agreements. The cooperation is implemented through **Vendor Programs**. A potential partner, before entering into cooperation, is verified by Millennium Leasing in terms of business potential, existing portfolio of joint contracts, credibility, and in certain cases a screening of the potential Vendor is performed by the Millennium Leasing Risk Department.

In most cases Millennium Leasing concludes cooperation agreements with suppliers of leased **assets**, providing for remuneration for the supplier for leads delivered to Millennium Leasing. The agreements have the nature of agency agreements and do not bind the parties on an exclusive basis.

Within the framework of the Vendor Programs Millennium Leasing cooperates both with leading suppliers (importers, dealers) - leaders in their segments, as well as with smaller, local players, e.g. with car consignment stores. Millennium Leasing's Vendors are suppliers of cars and trucks, truck

tractors and semi-trailers, construction machinery, forklifts, production machinery, e.g. for metal, plastic and wood working machinery, printing machines, as well as PV installations and heat pumps.

[GRI FS5] The Company commits suppliers to ethical and environmental standards for group contracts, in accordance with the principles contained in the Bank Millennium Group Code of Ethics.

4.7. TAX POLICY

[GRI 207-1] The Bank perceives the fulfilment of its tax obligations, including the proper and timely payment of tax liabilities, as an element of corporate social responsibility and its important social mission contributing to the sustainable social and economic development of the Republic of Poland providing also the necessary foundations for the sustainable development of the Bank.

The Bank's tax policy is set out in the document "Tax Policy of Bank Millennium S.A." available at: <https://www.bankmillennium.pl/en/about-the-bank/corporate-bodies-and-governance>

The tax strategy is approved by the Bank's Management Board based on the recommendation of the Head of the Tax Department. The tax strategy is subject to ongoing reviews and updates by the Head of the Tax Department adapting it to the dynamically changing regulatory environment in Poland.

[GRI 207-2] Chapters III and IV of the "Bank Millennium S.A.'s Tax Policy" describe in detail the principles and process of tax risk management in the Bank.

Tax planning and interpretation of tax laws in the classification of various events and projects is done keeping in mind the Bank's low appetite for tax risk and maintaining the highest standards of diligence to ensure tax compliance. In order to ensure tax compliance, the Bank maintains appropriate tax governance governed by intra-bank acts defining the roles and responsibilities of the Bank's organizational units, as well as senior and junior management within the tax processes, taking into account the guidelines issued by the National Revenue Administration (KAS) resulting from the Internal Tax Supervision Framework published by the Ministry of Finance providing assurance of proper performance of duties.

[GRI 207-3] In its relations with KAS authorities, the Bank ensures transparency and due diligence in the performance of its duties, in particular by providing reliable, complete and timely explanations in accordance with the highest standards. As a member of the Polish Bank Association and Polish Confederation Lewiatan, the Bank participates in social consultations regarding draft amendments to the tax law. The Bank is open and collects stakeholder opinions and concerns on tax issues by responding in writing to the issues presented. The Bank also publishes on its website the ongoing stakeholder-related tax processes. The Bank discloses detailed information on tax matters in the annual information on the implemented tax strategy published pursuant to Article 27c of the CIT Act (link: <https://www.bankmillennium.pl/en/about-the-bank/corporate-bodies-and-governance>).

CORPORATE SAFETY

4.8. SAFETY OF CLIENT FUNDS

[GRI 3-3, OWN DISCLOSURE 5] Ensuring safety of the funds entrusted by clients is a priority in the activity of the Bank Millennium Group. Efficient management of this area is governed by the Bank's and Group Companies' safety, fraud prevention and risk management policies, code of ethical conduct and best market practices. The Bank's internal regulators serve the prevention and identification of various risks related to the conduct of banking business. Employees are trained regularly on the rules for preventing abuse and ensuring protection of the clients' funds and data. **Additionally, a number of technical safeguards operating in a multi-layer model (defence in depth) have been implemented in this area.**

Millennium TFI ensures safety of funds entrusted by clients to funds managed by the Company in accordance with the provisions of law regulating the operation of investment funds and investment fund companies. Under the Act, the maintenance of participant records and the execution of participant instructions has been entrusted to a specialized entity, the transfer agent. Safety of assets belonging to the funds is ensured by their custodian, which for Millennium Funds is Bank Millennium.

4.8.1. SAFETY OF INFORMATION AND TRANSACTIONS

[GRI 3-3] The Bank uses its best efforts to ensure the protection of clients' funds and privacy. To this end, risk analyses are conducted both before the preparation of new products and services and globally - describing the whole ICT environment of the Bank. The key risks associated with inadequate protection of clients' funds and privacy are leakage, loss or unauthorized modification of client data.

Information security management system

The information security system in place in the Bank Millennium Group is **modelled after the international ISO/IEC 27001 standard** which defines the requirements for establishing, implementing, operating, monitoring, reviewing, maintaining and improving information security management in the organization. The information security management system consists of a set of the documented processes in force in the Bank and in the Bank Millennium Group's companies in the part aligned to the profile of the activity they conduct.

Information systems security audits/tests

The bank regularly conducts security audits/tests of information systems - both external and internal. Regardless of the audits required by the provisions of the Act on the National Cybersecurity System, performed at least once every two years, the Bank performs a number of appropriate audits/tests - depending on needs. Audit processes concern both functioning systems, with particular emphasis on systems processing customer data and systems made available on the Internet, as well as modifications, new solutions and systems that are being implemented.

Model of security management

The accepted information security management model determines the comprehensive system for protecting all information processed in the Bank, including information on clients, employees, business partners and transactions. In order to achieve this goal, the Bank uses a broad range of organizational, IT, telecommunication measures and in particular device protection mechanisms, systems, applications, databases and communication channels. The information security management model was constructed to safeguard against influence being exerted by key risks such as a potential

loss of information concerning financial transactions, a leak of confidential information and inaccessibility of services.

The Bank pays particular attention to the security of customers using electronic channels to access banking services and products, improving technical and operational methods of protection. The Bank uses proven and safe methods to confirm the identity of IT system users and constantly develops them to ensure safe and convenient access to the Bank's websites. Customers can use innovative identification methods, such as biometrics.

New threats and criminals' methods of operation are constantly analyzed to counteract them even more effectively. Moreover, the Bank actively cooperates with other financial sector entities in Poland and abroad, exchanging knowledge about modern threats, trends and changing fraud methods.

Organization of security

The data and resources of Bank Millennium clients are under constant oversight of a dedicated specialist team ensuring security of all the channels used to access the Bank's products and services. The Bank's organizational structure includes a unit responsible for broadly understood security, which includes teams dealing with all aspects of security, from physical security, through all aspects of cybersecurity and ICT security, to fraud risk management. Moreover, as part of the above-mentioned The unit responsible for security has a team responsible for performing ongoing vulnerability checks in the Bank's systems. These checks are performed on a continuous basis. The bank acts proactively towards potential security incidents by monitoring and ongoing work of the Security Operation Center (24/7).

Trainings in data protection and cybersecurity area

An important element of the information protection system at the Bank is a mandatory educational program covering all employees. It contains a set of information on good practices in the field of personal data protection, banking secrecy, trade secrets and other confidential data. The training covers both employees of the Bank Millennium Group and employees of cooperating companies who may have access to the Bank's network.

[OWN DISCLOSURE 6] Safety trainingBank Millennium Group	2023	2022	2021	2020
% of employees trained	94%	91%	90%	91%

Educational activities in the field of cybersecurity

We educate various groups of clients, including seniors, teenagers, and parents of younger children. Additionally, as a Bank, we publish warnings about new methods of operation of criminals on our website and in electronic channels:

<https://www.bankmillennium.pl/en/electronic-banking/internet-banking-security>

Additionally, the Bank carries out periodic, controlled phishing campaigns, further increasing the security maturity level of its employees.

4.8.2. PROTECTION OF PERSONAL DATA

[GRI 3-3] In particular, Bank Millennium processes personal data in order to operate bank accounts, securely execute instructions, perform obligations imposed by law on the Bank, and to inform about new services and products. The Bank as a data controller makes every effort to implement the requirements of the Data Protection Regulation 2016/679 (GDPR) to the fullest extent possible and thus protect personal data. Bank Millennium has appointed a Data Protection Officer, who supervises the proper processing of data and regulations regarding the protection of personal data in the Bank Millennium Group. In addition, a special unit has been established in the Bank, i.e. the Data Protection Office, whose task is to provide advice, support and supervision of the fulfillment of obligations in the field of personal data processing.

According to the GDPR, personal data processing is any operation on personal data. We are aware that for our clients or other people cooperating with us, transparency and availability of information are crucial, hence we have collected a set of information on the principles of personal data processing and privacy policy in one place, on our official website: <https://www.bankmillennium.pl/en/data-protection>.

To ensure compliance with GDPR requirements, the Bank has implemented the Bank Millennium Personal Data Security Policy, which applies to all business lines and companies in the Bank Millennium Group. The Bank's Management Board is responsible for approving, implementing and modifying the Personal Data Security Policy. This policy establishes general rules for the processing of personal data, which should be observed and applied by all persons processing personal data in the Bank Millennium Group, both in IT systems and in a traditional way (in paper form). In particular, the Policy covers the following issues:

- Principles of personal data processing,
- Obligations of the Data Protection Inspector,
- Authorizations and obligations of IT system users,
- Transparency of processing,
- Rights of data subjects,
- Risk analysis and assessment of the effects of processing,
- Entrusting the processing and sharing of personal data,
- Technical and organizational measures to ensure the security of personal data,
- Procedure in the event of a personal data protection breach.

As part of the adopted principles of personal data processing, the Bank ensures that only specific persons with appropriate authorizations and rights have access to documents containing personal data. Access control is implemented both by limited access to rooms where information in paper form is stored, and by ensuring appropriate procedures for access to all personal data files in electronic form.

Our clients' rights regarding the processing of their personal data

The principles of personal data processing are always presented in the information clause. Customers are familiarized with the relevant information clause before concluding a contract regarding banking products or services. They can also view its content available on the Bank's website at any time: <https://www.bankmillennium.pl/en/data-protection>

Each of the available information clauses indicates the scope, legal basis and purposes of processing, as well as the applicable retention period, i.e. the maximum period of personal data processing. As a rule, the bank does not process data for purposes other than those indicated in the information clauses, but if these purposes change, clients are informed about this fact in detail.

Clients and all other data subjects are informed by the Bank about their rights to:

- access to their own personal data,
- rectification of personal data if its content is incorrect,
- deletion of personal data after the applicable data retention period has expired,
- restrictions on the processing of personal data,
- transfer of personal data,
- object to processing, and
- withdrawal of consent to data processing - where consent was its basis.

In the case of users using the Bank's website, users are informed about the principles of using their cookies and asked to consent to their installation, if such consent is required.

Detailed information on this topic can be found at the link below:

<https://www.bankmillennium.pl/en/policy-cookie-files>

Bank Millennium processes personal data of clients, employees and other persons in relations with the Bank using technical and organizational measures necessary to ensure the security of this data. Personal data is one of the key resources for the Bank, and their security is the highest priority. The Bank constantly improves the technical and organizational measures used to ensure protection of the processing of personal data, in particular securing data against disclosure to unauthorized persons, loss or unauthorized change.

At the same time, in the case of Bank Millennium clients, personal data is also covered by banking secrecy, which involves the obligation to ensure even more extensive protection of data regarding clients relations. To ensure the highest standards also in this respect, training is provided in the field of protected information security, including personal data protection and banking secrecy.

Sharing of personal data with and transfer to third parties

In certain situations, the sharing of personal data by the Bank is essential for the provision of banking services, such as in the case of transfer orders. Information is always shared following the highest standards of personal data protection and in compliance with banking secrecy regulations.

The Bank shares personal data of its clients only if it is necessary and each time it examines and ensures the proper legal basis for such sharing. Data is shared with the application of appropriate security measures to prevent unauthorized access, loss or compromising of data. The amount of personal data shared will be limited to the minimum necessary to achieve the stated purpose.

If personal data must be processed by separate entities providing services to the Bank, the Bank may entrust the processing of such data by means of a written agreement that complies with the requirements of Article 28 of the GDPR. When entrusting the processing of personal data, the Bank only uses the services of such processing entities that provide adequate guarantees of using appropriate technical and organizational measures to ensure that the processing complies with the requirements of the GDPR and that the rights of data subjects are protected.

The Bank's clients and employees are informed of the data sharing and outsourcing of data processing in the relevant information clauses.

The Bank responds in a timely manner to data subjects' requests regarding data transfer, data access and data deletion. In 2023, a total of 1,113 such applications were processed.

Handling of data breaches

Our activities are designed to ensure full protection of personal data of our customers and those who work with us. In the rare event of a data breach, the Bank's policy is to respond promptly and to treat each incident with special care.

All incidents, even potential incidents, are reported to a team working 24/7 and then referred to data protection specialists for further analysis if the matter involves the processing of personal data. Based on these analyses, the Bank continuously improves its security measures.

In the event of a data breach, the Bank notifies the data protection authority and, in certain situations, the data subject, as required by Articles 34 and 35 of the GDPR, in the manner and within the timeframe specified in these provisions. If an incident involves identity theft, the Bank cooperates fully with the relevant law enforcement authorities.

[GRI 418-1] Significant complaints concerning violation of the client’s privacy and loss of data in 2023

Number of justified complaints concerning violation of the client’s privacy received from external parties and acknowledged by the organization*	70
Completed proceedings conducted by the President of the Office for Personal Data Protection (PUODO)**	9
Total number of identified personal data security incidents, ***	117
of which requiring reporting to PUODO	30

* Disclosure pertains to Bank Millennium - client complaints filed in person or by representative entities, does not include PUODO proceedings that are handled outside of the complaint process
 ** proceedings before PUODO concerning personal data protection violations concluded in 2023 (does not apply to proceedings concluded by an appealed decision)
 *** pertains to GDPR incidents registered during the calendar year

4.8.3. FRAUD PREVENTION

Elements of the fraud prevention system are built and tailored to the company's current needs based on the **Fraud Risk Management Program**. The system enables coordination of actions taken by the Bank’s various units involved in fraud detection, investigation and prevention. At the same time it provides professional tools and solutions to ensure effective protection of the clients’ funds. To this effect, numerous preventive mechanisms have been designed and implemented to monitor transaction systems. These tools are constantly developed in order to better identify fraudulent schemes.

As a result of the analyzes carried out, in 2023 the Bank decided to expand the methods used to counteract fraud related to:

- taking over clients' identities in electronic banking (so-called Account Takover Fraud, ATO), resulting in the activation of a mobile application on the fraudster's device or tokenization of cards in external wallets (e.g. Apple Pay, Google Pay) and
- social engineering attacks using the telephone channel (voice phishing, vishing), involving fraudsters impersonating bank employees.

In order to limit cases of activation of the Bank’s mobile application on fraudsters' devices, leading to third parties taking over access to the customer’s account (so-called Account Takover - ATO), the Bank

has changed the process of activating the mobile application and requires the Customer to take additional actions in the event of increased risk.

In 2023, a completely new decision engine was implemented at the Bank, supporting the process of monitoring fraudulent transactions, enabling real (online) correlation of information from many different types and sources of data, and using artificial intelligence mechanisms to increase the effectiveness of fraud detection. The implementation of advanced mechanisms in this new engine to detect unauthorized card tokenization operations and prevent suspicious transactions using such a suspicious mobile wallet has effectively contributed to a significant decrease in fraud using mobile wallets.

Thanks to the implementation of the described anti-fraud mechanisms and regular review of their parameterization, the share of frauds related to ATO Fraud has been significantly reduced.

In order to reduce the phenomenon of fraud related to impersonating Bank employees, a pilot solution was implemented that allows the customer to verify the authenticity of a telephone contact initiated by Bank employees in the mobile application. The goal is to implement a new standard of telephone communication with customers who have a mobile application with an active mobile authorization service. The new communication standard will consist in replacing the standard inquiry of the Customer about personal and product data during the identification and authentication process during telephone calls initiated by the Bank's employees with the approval of a push notification in the customer's mobile application. The content of the push notification will include the details of the calling Bank employee.

Ultimately, this service will be obligatory, i.e. it will always be used in the case of a telephone call initiated by a Bank employee, and not only at the request of a customer who has doubts about the identity of the caller.

Due to the fact that phishing abuses are often accompanied by the practice of installing "remote desktop" software used by fraudsters to make unauthorized transactions or obtain customer credentials, the Bank has implemented technical security measures in the Bank's mobile application (for both system platforms, i.e. Android and iOS), which prevents session recording via such software.

4.8.4. ANTI-MONEY LAUNDERING AND COUNTERING TERRORISM FINANCING (AML/CTF)

Bank Millennium identifies and assesses the risks of money laundering and terrorist financing relating to the Bank's activities, taking into account risk factors concerning clients, countries or geographical areas, products and services, transactions, their delivery channels, taking into account the nature and size of the Bank.

The Bank's internal regulations on Anti-Money Laundering and Countering the Financing of Terrorism (AML/CTF), including the AML/CFT Policies and Sanctions, as well as the AML/CTF Procedure, form a comprehensive system for identifying areas of risk posed by money laundering or terrorist financing. In order to minimize the risk, the Bank operates in accordance with the provisions of the aforementioned internal AML/CTF regulations, which defines the rules of conduct consistent with national and international laws and banking standards.

The Bank applies financial security measures with respect to its clients, appropriate to the level of identified AML/CFT risk, takes steps to mitigate the risk of opening relationships and conducting business with persons or entities suspected of obtaining their funds illegally.

The Bank complies with Polish AML/CFT regulations, European Union and United Nations legal regulations and international banking standards concerning specific restrictive measures (sanctions).

The AML/CFT internal procedure is reviewed at least once a year for compliance with applicable laws and regulations.

All Bank Millennium employees are obliged to make every effort to prevent the use of the Bank's products and services for money laundering and terrorist financing and to report any suspicious activity promptly to the appropriate banking unit.

The Bank conducts AML/CFT training for all employees in order to meet the highest standards, in particular with regard to the applicable AML/CFT regulations, including inter alia the application of financial security measures and specific restrictive measures within the client business relationship and the typology of money laundering. The Bank has procedures and channels in place to report AML violations that ensure anonymity and fully reflect the requirements of the Act.

The most important functions, roles and responsibilities as well as specific areas, in particular high risk areas, are adequately described in the Bank's internal regulations. A dedicated AML unit is appropriately placed in the Bank's organizational structure, and the persons responsible for the Bank's AML activities have appropriate competence and qualifications.

The Bank's Management Board is regularly informed on how it is implementing its obligations under the AML Act. In particular, reporting includes the most relevant information as part of management information, including major changes in laws and regulations, statistical data and other data required to present a complete picture of AML/CFT risk in the organization. The Bank has in place a specialized AML Committee, which receives regular information on this subject. AML/CFT reports are also submitted to the Supervisory Board Risk Committee (on a quarterly basis) and to the Supervisory Board (on an annual basis).

Bank Millennium Group companies which are obligated institutions have separate AML/CFT policies and procedures and apply the requirements of AML/CFT regulations in a consistent manner.

Employees performing AML/CFT related duties are appropriately trained in this respect, according to the training program.

4.8.5. MECHANISMS FOR REQUESTING ADVICE AND REPORTING POTENTIAL IRREGULARITIES

The Bank Millennium Group's key policies are posted on the Bank's website. Moreover, policies, procedures and instructions are disseminated among employees via the corporate intranet. Employees may obtain advice on the pursuit of the Company's policies and practices of responsible business conduct by referring to the pertinent units, depending on the area in which the advice is sought. For instance, as regards the pursuit of the policy to ensure compliance with supervisory laws and regulations and with internal procedures, the Compliance Department is the competent unit; for the HR policy, the HR Department is the place to go to; for issues related to credit risk, it is the Risk Department. For issues related to responsible business conduct practices, the Compliance Department is the appropriate unit for consultation. Also, a number of solutions have been implemented in the Group, which - through various communication channels, including in helpdesk format - provide employees with access to advice and clarification regarding such issues as the functioning of products, the operation of processes in the Group, or formal and legal aspects.

[GRI 2-16, 2-26] The Bank Millennium Group has in place a system for reporting violations understood as non-compliance by its employees with the provisions of applicable laws, internal regulations or market standards. Employees are provided with procedures and tools for advice seeking and anonymous reporting of violations. Individual companies from the Bank Millennium Group have separate procedures for reporting violations.

This process takes place on the basis of the "Instructions for reporting breaches at Bank Millennium S.A." adopted by the Bank (with respect to potential breaches committed by employees other than the Bank's Management Board Members) and the "Rules for reporting breaches to the Bank Millennium S.A. Supervisory Board (with respect to potential breaches committed by the Bank's Management Board Members). The report can be made by e-mail, by sending a message to the dedicated function box * VIOLATIONS - a channel that does not ensure the anonymity of the reporting person or by post - by sending a letter marked "in person" to the President of the Bank (if the report concerns the Bank's employees) or the Chairman of the Supervisory Board (if the report concerns Member of the Bank's Management Board) - a channel ensuring the anonymity of the reporting person.

[GRI 2-16] Reports submitted as part of the breach notification process described above are reported by the Compliance Department as part of its reporting obligations to the Bank's Management Board, the Audit Committee of the Supervisory Board and the Supervisory Board. In 2023, there were no reports that met the definition of the Bank Millennium S.A. Whistleblower Manual or the Bank Millennium S.A. Supervisory Board Whistleblower Policy.

Moreover, the Bank has appointed an Ethics Officer whose responsibilities include safeguarding compliance with the Code of Ethics, promoting and disseminating information about ethical standards, ordering inspections of compliance with ethical principles and verifying cases of their breach. Other issues pertaining to the role of the Ethics Officer and the ethics management system are described in section 4.5. "Ethical standards and human rights".

4.8.6. PREVENTING CONFLICTS OF INTERESTS

[GRI 2-15] The Bank has implemented Policy for the prevention of conflicts of interest at Bank Millennium S.A. According to its contents, the **Bank has introduced the following rules** governing this area:

- accepting and giving monetary and non-monetary performances ("incentives"),
- review and approval of products,
- appropriate organizational structure (including transparent official reporting structures) and information barriers,
- compensation policies applied,
- personal transactions,
- engaging in additional or competitive activities,
- transactions with entities from the Bank Millennium Group.

The Bank's Management Board is responsible for the proper management of conflicts of interests and supervising them. Periodically, at least once a year, on the basis of the recorded cases of existing conflicts of interest, the Compliance Department analyzes the reasons for their occurrence and presents to the Bank's Management Board conclusions aimed at eliminating them in the future.

The Brokerage House of Bank Millennium S.A. has adopted separate regulations in this regard, applicable to the Policy for the prevention of conflicts of interest in the Bank Millennium S.A. Brokerage House, "Procedure for identifying, classifying and assessing the monetary and non-monetary performances accepted and given by the Bank Millennium S.A. Brokerage House in connection with the rendering of investment services" and the "Regulations of Personal Transactions of Involved Person in the Bank Millennium S.A. Brokerage House".

Some subsidiaries adhere to specific regulations on top of the regulations that span the Bank Group, e.g. Millennium Towarzystwo Funduszy Inwestycyjnych applies the Rules and regulations for managing conflicts of interest in Millennium TFI S.A.

Management Board and Supervisory Board Members are required to notify the Bank of any existing conflict of interest or its potential occurrence. Apart from the self-assessment mechanism applied by members of the Management Board and the Supervisory Board, the Bank independently conducts its own monitoring and analyses in this area. If, based on such analysis, the Bank identifies a conflict of interest with regard to any member of these bodies, the compliance unit (at its own initiative or on the basis of an alert from another unit) notifies the Supervisory Board Chairperson/President of the Management Board or an independent member of the Supervisory Board/another member of the Management Board. A member of the Management Board or Supervisory Board should refrain from voting on any matters where he or she remains in a conflict of interest or any matters where his or her objectivity or ability to properly perform his or her duties may be impaired.

Stakeholders are kept up to date about any occurring conflicts of interest. The disclosure of information about conflicts of interest is used by the Bank only as a last resort when the Bank is unable to effectively prevent and manage the respective conflict of interest. The Bank discloses information on conflicts of interest when the residual risk of damage to stakeholders persists and when organizational or administrative solutions implemented by the Bank are insufficient to ensure, with due certainty, that the risk of damage does not occur.

4.8.7. ANTI-CORRUPTION

[GRI 3-3] The Bank's approach assumes zero tolerance for any form of corruption, which can be briefly reduced to accepting or giving benefits (both financial and non-financial) aimed at achieving a certain behaviour or omission of the other party.

To this effect, in 2021 the Bank implemented a separate regulation dedicated to this subject, entitled "Anti-Corruption in Bank Millennium S.A. Polices and Guidelines".

The document attempts to comprehensively cover the topic of corruption and addresses the following areas:

- **The roles and responsibilities of individual persons, units and bodies of the Bank** - the responsibility for counteracting corruption rests with each Bank employee, which means that they are obliged, in the case of suspicion that an act of this kind has been committed, to immediately inform the relevant Bank services, and if they fear the consequences of their report, they can provide the information anonymously. The regulation also defines the roles of the Bank's Management Board and Supervisory Board, which should properly oversee the implementation and periodic evaluation of the adequacy and effectiveness of the implemented anti-corruption system. The Bank has also established the function of a Coordinator responsible for the implementation of the anti-corruption process and independent monitoring of compliance with the rules imposed by the aforementioned regulation.
- **Relations with business partners** - the Bank considers proper relations with its business partners to be fundamental to the efficient and transparent functioning of the Bank and the provision of specific services by the Bank to its clients. This imposes a special obligation on the Bank to analyze each business partner, both at the stage of establishing the relationship and throughout its duration. Within the framework of this analysis, the relevant Bank services should pay special attention to such issues as: key personnel of the business partner, negative information from publicly available sources (including the media), verification of counterparty details against the sanction lists used in the Bank, capital and personal relations with other entities or verification of references.
- **Relations with officials** - this type of relationship is considered by the Bank in two aspects, that is, employment and interaction at the official level. As far as the former aspect is concerned, the Bank, when employing such persons, makes every effort to prevent conflicts of interest, taking into account the legitimate interests of such persons and the provisions of generally applicable laws (especially in the areas of personal data protection and labour law). In the latter case, the Bank has decided to strictly prohibit the giving or receiving of benefits, irrespective of their value or nature; this includes the prohibition of benefits of an incidental nature, typically given or received on such occasions.
- **Relations with other organizations** - in the case of political parties, the Bank has adopted a policy of complete neutrality, which means not undertaking the financing of political parties, either directly or indirectly. With respect to non-profit organizations (such as charities or foundations), the Bank permits the financing of such organizations in accordance with its internal regulations.
- **Giving and receiving benefits** - the Bank divides benefits into three main categories, i.e. gifts, representation events and business events. Depending on the type of benefit, the path forward varies. However, the main principle is the recording of benefits and, in certain situations specified in the regulation, their prior approval by the relevant Bank services. All this is to tighten the process of circulation of various types of benefits, which may be received or given by the Bank's employees.

Corruption-related risks are analyzed for all units of the Bank Millennium Group.

[GRI 205-2] Within the framework of mandatory training on the Code of Ethics employees familiarize themselves with the Bank Millennium Group’s anti-corruption policy. Additionally, in connection with the implementation of the new regulation "Anti-Corruption in Bank Millennium S.A. Policies and Guidelines", an educational campaign is conducted through internal communication channels by publishing articles explaining the most important aspects of counteracting corruption in the organization.

[GRI 2-26] Employees may also pose questions and report observed irregularities in this area via an e-mail inbox or they may contact their immediate supervisor or the person running the Compliance Department.

In addition, in 2023, training on counteracting corruption took place:

[GRI 205-2] Trained on corruption counteracting *	Bank 2023	Group 2023
Managerial staff trained in the year	1,040 97.20%	1,050 97.22%
Other employees trained in the year	5,267 97.32%	5,291 97.33%

** Number and % of persons trained. The training was communicated to 100% of employees employed in Bank Millennium S.A., Millennium Bank Hipoteczny and Millennium Leasing. The remaining companies of the Group were not covered by anti-corruption training in 2023, but the Bank is working on making it available to employees of these companies in 2024.*

Members of the Management Board do not receive training, but the Bank is working on providing them with training tailored to the specific nature of their tasks. The training for Management Board Members will also include annual familiarization with internal regulations in the area of counteracting corruption. In 2023, Members of the Management Board were not familiar with the internal regulations regarding anti-corruption. Internal regulations in this area were not changed in 2023.

Each supplier participating in the tender, by signing a statement, undertakes to comply with the principles contained in the "Code of Ethics of the Bank Millennium Group", including respect for human rights and the principles of the anti-corruption policy. Content of the regulation "Counteracting corruption in Bank Millennium S.A. Rules and guidelines" is communicated and made available to 100% of business partners and to each of the suppliers participating in the tender. The Bank does not organize separate training on corruption for business partners, but the Anti-Corruption Principles are made available to business partners and other stakeholders on the Bank's website.

[GRI 205-1] As part of the assessment of individual components of operational risk, also the aspect of vulnerability to corruption risk of different types of Bank's activities is analyzed by the Internal Audit Department in the course of audit activities. Past experience in this area confirms the adequacy and effectiveness of the control mechanisms implemented for this purpose, such as procedures, segregation of duties, authorizations and limits. Periodic audits of the Internal Audit Department cover all activities of the Bank and all business processes within the Bank Millennium Group. **[GRI 205-3, 3-3]** No detected cases of corruption in 2023 in the Bank Millennium Group. There were also no cases of confirmed incidents in which employees were dismissed or disciplined for corruption, no confirmed incidents in which contracts with business partners were terminated or were not extended due to corruption-related violations, and no public corruption court cases initiated against the Bank or its employees. In addition, some subsidiaries have their own anti-corruption regulations. Millennium Towarzystwo Funduszy Inwestycyjnych applies own anti-corruption regulations stemming from the legal requirements applicable to this category of entities set forth in the "Rules and regulations for accepting and giving incentives".

4.9. INTERNAL CONTROL SYSTEM

4.9.1. COMPLIANCE

The rules and standards of ensuring compliance with external and internal regulations are described in the document entitled **Bank Millennium S.A. Compliance Policy**. Within the compliance risk management process, Bank Millennium considers the following areas to be particularly important:

- monitoring changes in legislation and market standards,
- ensuring compliance of the Bank's internal regulations with the generally applicable provisions of law, as well as recommendations issued by regulatory authorities,
- monitoring and approving new products and modification or withdrawal of existing products,
- approving marketing materials,
- reporting violations of applicable laws, internal regulations or market standards,
- preventing money laundering and financing of terrorism,
- preventing and managing conflicts of interest,
- preventing corruption,
- observing the ethical principles;
- personal transactions,
- protecting confidential information and professional secrets,
- monitoring and ensuring compliance with respect all of the bank's products and services, including financial products and services covered by MiFID II.

A report on the operation of the system for supervising legal compliance is presented quarterly to the Bank's Management Board and the Supervisory Board Audit Committee, and annually to the Supervisory Board.

[GRI 2-27] In 2023, no financial penalties were imposed on the Bank by final judgment for non-compliance with generally applicable laws.

[GRI 2-27] The Bank defines as material cases of non-compliance with the laws and regulations those situations where fines or other sanctions have been imposed for non-compliance with the requirements of generally applicable law.

In 2020-2023, the Bank recorded only one case of non-compliance within the above meaning, identified specifically in 2020, resulting in a fine of PLN 10,464,213 (in this case, the Bank has filed a cassation appeal to the Supreme Court). In the said period, the Bank was not involved in any other case of non-compliance resulting in penalties other than fines.

[GRI 206-1] The report on court cases can be found in the chapter titled: "Court cases" in the Annual Financial Statement of the Bank Millennium S.A. Capital Group for the 12-month period ended December 31, 2023.

In accordance with the above-mentioned chapter, in the field of anti-competitive behavior and violation of antitrust and antimonopoly regulations, the status of court cases to which the Office of Competition and Consumer Protection in Poland is a party is as follows:

1	Number of legal proceedings pending in the reporting period regarding anti-competitive behaviour in which the organization was a participant (applies only to proceedings regarding competition-restricting practices described in the financial statements in the above-mentioned chapter).
0	Number of legal proceedings completed in the reporting period regarding anti-competitive behaviour in which the organization was a participant.
0	Number of legal proceedings pending in the reporting period regarding violations of antitrust and antimonopoly regulations in which the organization was a participant.
0	Number of legal proceedings completed in the reporting period regarding violations of antitrust and antimonopoly regulations in which the organization was a participant.

A description of the decisions regarding the case included in the above list can be found in the chapter titled “Court cases” in the Annual Financial Statements of the Bank Millennium S.A. Capital Group for the 12-month period ended December 31, 2023.

4.9.2. INTERNAL AUDIT

The activity of Internal Audit is regulated by the „Audit charter - the principles pertaining to internal audit activity in Bank Millennium S.A.”. This is scheduled activity based on the annual audit plan. The planning process is based on the evaluation of risks in individual areas and processes of the Bank and of the Subsidiaries to identify the elevated risk and supporting the priorities and resources for implementing tasks. The planning process takes into account consultations with senior management and key process owners. The annual audit plan is approved by the Bank’s Supervisory Board and is implemented, on a quarterly basis, by experienced and qualified professionals.

Internal audit is a separate, within the internal control system of Bank Millennium S.A., independent and objective advisory activity, performed by the Internal Audit Department, aimed at generating value and improving processes in the Bank/Group of Bank Millennium S.A. as well as assessing the adequacy and effectiveness of the risk management system and internal control system. Advisory activity may be performed if its character does not compromise the principle of the internal auditor’s objectivity and independence.

In 2023, as part of the assurance activity, the Internal Audit Department performed audit tasks in the Bank, in the Bank’s subsidiaries, in third party companies to which, where permitted by law, the Bank outsourced the performance of banking and banking-related activities and within the BCP Group. The Department’s planned activity covered, among other things, the performance of audits of key business processes and support processes of branches and compliance with external regulatory requirements. Tasks performed by the Internal Audit Department also included clarification procedures and preventive audits. As part of its advisory activities, the Department performed tasks related to the coordination of the SREP process, inspections and supervisory / external audits carried out at the Bank.

The Internal Audit Department is an independent unit reporting to the Chairman of the Bank's Management Board, which delivers results of its activities to the Audit Committee of the Supervisory Board and to the Bank's Supervisory Board. The results of the operating review of the entire internal control system and of its selected elements are presented regularly and evaluated by the Audit Committee of the Bank's Supervisory Board.

ESG issues in the audit plan

ESG topics are included in Internal Audit's ongoing Audit Strategy and Three-Year Audit Plan for 2022-24. The 2023 the audit examination included verification and evaluation of controls related to ESG organization and reporting. The scope of auditing specific aspects of ESG is evaluated annually in the audit planning process for the following year.



5 EU TAXONOMY

Legal basis for the Group's reporting obligations under the EU Taxonomy

The Bank Millennium Group is required to publish EU Taxonomy information under Article 8 of Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020. ("EU Taxonomy").

The Group prepares EU Taxonomy disclosures in accordance with Regulation 2021/2178³ as amended by Regulation 2022/1214⁴ and by Regulation 2023/2486⁵.

Based on the requirements set out in Annex V of Regulation 2021/2178, Bank Millennium prepares EU Taxonomy disclosures on a consolidated basis according to the scope of prudential consolidation

³ Commission Delegated Regulation (EU) 2021/2178 of 6 July 2021 supplementing Regulation (EU) 2020/852 of the European Parliament and of the Council by specifying the content and presentation of information to be disclosed by undertakings subject to Articles 19a or 29a of Directive 2013/34/EU concerning environmentally sustainable economic activities, and specifying the methodology to comply with that disclosure obligation

⁴ Commission Delegated Regulation (EU) 2022/1214 of 9 March 2022 amending Delegated Regulation (EU) 2021/2139 as regards economic activities in certain energy sectors and Delegated Regulation (EU) 2021/2178 as regards specific public disclosures for those economic activities

⁵ Commission Delegated Regulation (EU) 2023/2486 of 27 June 2023 supplementing Regulation (EU) 2020/852 of the European Parliament and of the Council by establishing the technical screening criteria for determining the conditions under which an economic activity qualifies as contributing substantially to the sustainable use and protection of water and marine resources, to the transition to a circular economy, to pollution prevention and control, or to the protection and restoration of biodiversity and ecosystems and for determining whether that economic activity causes no significant harm to any of the other environmental objectives and amending Commission Delegated Regulation (EU) 2021/2178 as regards specific public disclosures for those economic activities

applied by the Bank for capital adequacy purposes. The Bank's subsidiaries subject to prudential consolidation include:

- Millennium Bank Hipoteczny S.A.
- Millennium Leasing sp. z o.o.
- Millennium Consulting S.A
- Millennium TFI S.A.
- Millennium Service sp. z o.o.
- Millennium Goodie sp. z o.o.
- Millennium Telecommunication Services sp. z o.o.

Pursuant to Article 10(5) of Regulation 2021/2178, from 1 January 2024, the **Group must disclose key performance indicators of financial undertakings (in particular the Green Asset Ratio - GAR)**, including all relevant accompanying information, based on Annexes V, VI, XI and XII of the Regulation (whereby point 1.2.3 and 1.2.4. Annex V shall apply from 1 January 2026). This information relates to the financing of activities specified in Regulation 2021/2139⁶ as amended by Regulation 2022/1214.

On the other hand, under Article 10(7) of Regulation 2021/2178, in the period from 1 January 2024 to 31 December 2025, the Group only discloses the percentage indicators of EU Taxonomy eligible and non-eligible activities (along with relevant qualitative information) - for the activities specified in Regulation 2023/2485⁷ (amending Regulation 2021/2139) and for the activities specified in Regulation 2023/2486.

EU Taxonomy-eligible financing granted by the Group are exposures that finance activities (or objectives/projects related to these activities) listed in Delegated Regulation 2021/2139 (as amended) or Delegated Regulation 2023/2486 - irrespective of whether these activities meet the Taxonomy technical screening criteria for sustainability.

EU Taxonomy-compliant granted by the Group (green/sustainable financing as defined in the EU Taxonomy) are exposures that finance activities (or objectives/projects related to these activities) that meet the material contribution criteria and "do no significant harm" (DNSH) criteria set out in Delegated Regulation 2021/2139 (as amended) or 2023/2486, and are in compliance with the minimum safeguards laid down in Article 18 of Regulation 2020/852. EU Taxonomy-compliant financing is a subset of EU Taxonomy-eligible financing.

Contextual information on key performance indicators for the activities laid down in Regulation 2021/2139 as amended by Regulation 2022/1214

The Bank prepares and discloses quantitative information on key performance indicators for the activities laid down in Regulation 2021/2139 as amended by Regulation 2022/1214 (i.e. **for the original scope of activities that can substantially contribute to the first two environmental objectives - climate change mitigation and adaptation**) in accordance with the methodology

⁶ Commission Delegated Regulation (EU) 2021/2139 of 4 June 2021 supplementing Regulation (EU) 2020/852 of the European Parliament and of the Council by establishing the technical screening criteria for determining the conditions under which an economic activity qualifies as contributing substantially to climate change mitigation or climate change adaptation and for determining whether that economic activity causes no significant harm to any of the other environmental objectives

⁷ Commission Delegated Regulation (EU) 2023/2485 of 27 June 2023 amending Delegated Regulation (EU) 2021/2139 establishing additional technical screening criteria for determining the conditions under which certain economic activities qualify as contributing substantially to climate change mitigation or climate change adaptation and for determining whether those activities cause no significant harm to any of the other environmental objectives

specified in Annex V of Regulation 2021/2178 and the tabular disclosure templates in Annexes VI and XII of that Regulation.

Annex V of Regulation 2021/2178 (followed by the changes introduced by Regulation 2023/2486) distinguishes between the following (partial) key performance indicators for credit institutions relating to assets :

- Total Green Asset Ratio (GAR) for financing activities directed at financial undertakings;
- Total Green Asset Ratio (GAR) for financing activities directed at non-financial undertakings;
- Green Asset Ratio (GAR) for residential real estate exposures, including house renovation loans, for the objective of climate change mitigation;
- Green Asset Ratio (GAR) for retail car loans, for the objective of climate change mitigation;
- Green Asset Ratio (GAR) for loans to local governments for house financing and other use-of-proceeds lending.
- Green Asset Ratio (GAR) for commercial and residential repossessed real estate collateral held for sale (repossessed in the collection process).

Total GAR is an indicator that accumulates all the partial ratios listed in items 1-6 above.

For each of the above indicators of EU Taxonomy-compliant exposures, the disclosure templates set out in Annexes VI and XII of Regulation 2021/2178 also provide for the disclosure of the corresponding percentages of EU taxonomy-eligible assets.

Additionally, Annex V to Regulation 2021/2178 requires the Group to disclose key EU Taxonomy indicators for off-balance sheet exposures - i.e. for certain financial guarantees issued and for assets managed by an investment fund company (TFI) belonging to the Bank's Group.

The Bank discloses quantitative information on the above indicators using detailed tabular formulas laid down in Annex VI to Regulation 2021/2178.

For exposures to financial and non-financial undertakings included in the partial indicators on assets and off-balance sheet items, the Group has adopted the following methodology to assess EU Taxonomy eligibility and alignment, in accordance with the requirements of Annex V of Regulation 2021/2178:

1. **for general purpose financing** - the assessment of eligibility and alignment is based on the EU Taxonomy key performance indicators, for revenue and capital expenditure (CapEx) published by the Group's clients and by identified subsidiaries of the Group's clients or by parent companies of the Group's client's⁸ - **therefore, in accordance with the requirements in Regulation 2021/2178, the Group calculates its key performance indicators twice (first on the basis of its clients' revenue indicators and second on the basis of its clients' CapEx indicators),**
2. **for use-of-proceeds financing** - the assessment of eligibility and alignment is based on the Bank's own analysis of the characteristics of the purpose of the financing and the information needed to verify compliance with the technical screening criteria of the EU Taxonomy and minimum social safeguards.

Financing of non-financial and financial undertakings

The Bank identifies entities eligible for inclusion in the GAR numerator (i.e. entities required to report under the EU Taxonomy themselves (as well as identified subsidiaries of such entities) or included in such reporting through consolidation by the parent company) based on InStrat's public database and

⁸ For the Group's clients that are financial undertakings, the Group uses the taxonomy indicators published by the Group's clients and based on the revenues or on the capital expenditures of the entities financed by the Group's clients.

expert portfolio review (for subsidiaries of entities included in InStrat’s database and for entities located outside Poland). The same approach was applied to financial enterprises.

Household financing

For the purpose of calculating the partial ratio related to the financing of households related to residential properties, the Group has assumed that:

1. all mortgage loans granted for the construction/purchase of a house/apartment are EU taxonomy-eligible under the “climate change mitigation” environmental objective,
2. The Group assesses the EU Taxonomy alignment of mortgage loans based on the technical screening criteria of the EU taxonomy described below and based on the verification on the physical risk maps for Poland that the location where the financed property is located is not significantly exposed to flooding or waterlogging⁹,
3. **For mortgage loans financing properties built before 31 December 2020, in accordance with the technical screening criteria of the EU Taxonomy, the Group has adopted the condition that the financed building is among the 15% most efficient buildings in the country or region in terms of Primary Energy Demand (PED).**
 - a) In order to identify the 15% most efficient buildings, the Group has assumed an analysis indicating that this pool includes all buildings built in Poland between 2017 and 2020. This analysis was based on statistical data of buildings built in Poland, including the report of the National Energy Conservation Agency S.A. on the typology of buildings for assessing their energy efficiency. The analysis also corresponds to the data presented in the Annex to Resolution No. 23/2022 of the Council of Ministers of 6 February 2022 - Long-term strategy for the renovation of buildings.
 - b) The assumed approach differs from the information published by the Ministry of Economic Development and Technology on the energy efficiency of buildings in the context of the provisions of Commission Delegated Regulation 2021/2139 of 4 June 2021 supplementing Regulation (EU) 2020/852 of the European Parliament and of the Council by establishing the technical screening criteria for determining the conditions under which an economic activity qualifies as contributing substantially to climate change mitigation or climate change adaptation and for determining whether that economic activity causes no significant harm to any of the other environmental objectives (Taxonomy of Sustainable Investment Financing - Buildings - Ministry of Economic Development and Technology - www.gov.pl). According to this information, residential buildings with a primary energy demand of less than 76.59 kWh/(m²*year) can be deemed to meet the criterion of being among the 15% most efficient buildings in the country or region in terms of primary energy demand (PED).

The Group’s taxonomic disclosures below include the value of EU Taxonomy-aligned mortgage loans that are obtained by using the approach arising out of the above-mentioned position of the Ministry of Economic Development and Technology, in the point 3b) above. Due to the fact that the Group did not have energy efficiency data for the financed properties at the time of preparing these disclosures, this value is 0.

Additionally, for the tables below, a disclosure has also been made that includes a value for the EU Taxonomy-aligned mortgage loans based on the approach described in the point 3a) above.

⁹ Pursuant to Commission Notice C/2023/267, the Group qualifies all mortgage loans granted to consumers as activity “7.7 Purchase of and ownership right of buildings” as part of the environmental objective “mitigation of climate change”.

1.0. Summary of key performance indicators to be disclosed by credit institutions under Article 8 of the Taxonomy Regulation

1.1. Assets for the calculation of the Green Asset Ratio - turnover-based

1.2 Assets for the calculation of the Green Asset Ratio - capital expenditures-based

3.1 GAR KPI stock - turnover-based

3.2 GAR KPI stock - capital expenditures-based

4.1 GAR KPI flow - turnover-based

4.2. GAR KPI flow - capital expenditures-based

Quantitative disclosures prepared in accordance with the formulas laid down in Annex XII of Regulation 2021/2178 - Nuclear and fossil gas related disclosures

4. Household loan products related to improving the energy efficiency of residential properties are considered EU Taxonomy-eligible under the “climate change mitigation” environmental objective, while in the current reporting cycle the Bank does not have the source data to reliably assess the EU Taxonomy alignment of these credit products.

At year-end 2023, the Bank does not identify any assets in its portfolio that could qualify for partial indices for consumer car financing, for use-of-proceeds financing for local governments, or for real estate taken into the Bank’s ownership in the loan loss recovery process.

Contextual information on key performance indicators for the activities laid down in Regulations 2023/2485 and 2023/2486

In accordance with Article 10(7) of Regulation 2021/2178, for the period from 1 January 2024 to 31 December 2025, and for the activities laid down in Regulations 2023/2485 and 2023/2486 (i.e. for the **new extended scope of activities that can substantially contribute to one or more of the six environmental objectives specified in the EU Taxonomy**), the Group only discloses the percentage indicators of EU Taxonomy eligible and non-eligible activities (along with relevant qualitative information).

The Group has reviewed its portfolio (from balance sheet and off balance sheet perspective) with respect to its eligibility for the above-mentioned “new” activities and concludes that:

- The loans related to residential real estate granted by the Bank to consumers and use-of-proceeds financing for businesses qualify only for the original scope of activities under the climate change mitigation objective and do not qualify for the “new” activities,
- Due to the timing of the reporting requirements for the “new” activities in the EU Taxonomy, which requires financial and non-financial undertakings to disclose indicators of the eligibility of their activities for the “new” activities for the first time in 2023, the Group is not in a position to reliably assess the eligibility of general purpose financing granted to businesses. The Group has not elected to take a simplified approach by carrying out an eligibility analysis based on the main NACE codes of its clients, since the Group believes that such information would not be comparable to the disclosures of eligibility of exposures to the “original” scope of activities, which follow precise indicators disclosed by the Group’s clients, and could mislead readers of this report.

Description of alignment with EU Taxonomy in the Group's business strategy, product design processes and engagement with clients and contractors

The Bank Millennium Group takes steps aimed at developing the portfolio of assets financing Taxonomy-aligned activities.

The Group's Strategy for 2022-2024 "People Inspire Us" as well as the ESG Strategy, which develops some of its tenets, contain objectives of actively supporting clients in their decarbonization efforts and granting PLN 2 billion of financing for sustainable and transformational projects for the clients of the Bank's Group over the next 3 years.

Our goal is to launch an offering of products that would support sustainability in various business segments in the areas of energy efficiency, the use of renewable energy sources and the circular economy, as well as to increase the funding allocated to sustainability projects through active participation in governmental and EU transformation programs to reduce negative environmental impacts.

The Bank is taking proactive measures that target building a portfolio of assets that finance environmentally sustainable activities, while adhering to the Environmental Policy and Responsible Financing Principles. Also to this end, the Bank carried out a comprehensive project in 2023 to build and implement a process for classifying green assets - based on the Bank's internal business criteria based on best market practices and based on the EU Taxonomy.

Quantitative disclosure in accordance with the templates specified in Annex VI to Regulation 2021/2178

1.0. Summary of key performance indicators to be disclosed by credit institutions under Article 8 of the Taxonomy Regulation - disclosure taking into account the value of mortgage loans aligned with the EU Taxonomy based on the approach described in the note "Household financing", point 3b).

		Total environmentally sustainable assets (PLN '000)	KPI****	KPI*****	% coverage (over total assets)***	% of assets excluded from the numerator of the GAR (Article 7 (2) and (3) and Section 1.1.2. of Annex V)	% of assets excluded from the denominator of the GAR (Article 7 (1)) and Section 1.2.4 of Annex V)
Main KPI	Green asset ratio (GAR) stock	25 669	0,03%	0,09%	65,30%	17,82%	34,70%

		Total environmentally sustainable activities (PLN '000)	KPI	KPI	% coverage (over total assets)	% of assets excluded from the numerator of the GAR (Article 7 (2) and (3) and Section 1.1.2. of Annex V)	% of assets excluded from the denominator of the GAR (Article 7 (1)) and Section 1.2.4 of Annex V)
Additional KPIs	GAR (flow)	168 727	0,91%	1,26%	33,50%	16,52%	49,53%
	Trading book*	n/a	n/a	n/a			
	Financial guarantees	0	0,00%	0,00%			
	Assets under management	29 146	1,00%	3,32%			
	Fees and commissions income**	n/a	n/a	n/a			

* For credit institutions that do not meet the conditions of Article 94(1) of the CRR or the conditions set out in Article 325a(1) of the CRR

**Fees and commissions income from services other than lending and AuM

*** % of assets covered by the KPI over banks' total assets

****based on the Turnover KPI of the counterparty

*****based on the CapEx KPI of the counterparty, except for lending activities where for general lending Turnover KPI is used

2. GAR sector information

Breakdown by sector - NACE 4 digits level (code and label)	Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and ecosystems (BIO)				TOTAL (CCA + CCA + WTR + CE + PPC + BIO)			
	Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
	[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount	
	PLN 1000	Of which environmentally sustainable (CCA)	PLN 1000	Of which environmentally sustainable (CCA)	PLN 1000	Of which environmentally sustainable (CCA)	PLN 1000	Of which environmentally sustainable (WTR)	PLN 1000	Of which environmentally sustainable (CE)	PLN 1000	Of which environmentally sustainable (PPC)	PLN 1000	Of which environmentally sustainable (BIO)	PLN 1000	Of which environmentally sustainable (BIO)	PLN 1000	Of which environmentally sustainable (BIO)	PLN 1000	Of which environmentally sustainable (BIO)	PLN 1000	Of which environmentally sustainable (BIO)	PLN 1000	Of which environmentally sustainable (BIO)	PLN 1000	Of which environmentally sustainable (BIO)	PLN 1000	Of which environmentally sustainable (BIO)
1 27.51 - Manufacture of electric domestic appliances	5 939	1 398			155	3			0	0			0	0			0	0			0	0			6 093,94	1 401,20		
2 26.51 - Manufacture of instruments and appliances for measuring, testing and navigation	5	5			0	0			0	0			0	0			0	0			0	0			5,25	5,25		
3 26.51 - Manufacture of instruments and appliances for measuring, testing and navigation	5	5			0	0			0	0			0	0			0	0			0	0			5,25	5,25		
4 33.13 - Repair and maintenance of electronic and optical equipment	0	0			0	0			0	0			0	0			0	0			0	0			0,00	0,00		
5 42.59 - Works related to construction of other civil engineering projects not elsewhere classified	55	0			0	0			0	0			0	0			0	0			0	0			54,99	0,00		
6 29.32 - Manufacture of other parts and accessories for motor vehicle excluding motorcycles	3	0			0	0			0	0			0	0			0	0			0	0			2,69	0,00		
7 42.12 - Works related to construction of railways and underground railways	3 626	0			0	0			0	0			0	0			0	0			0	0			3 626,44	0,00		
8 47.22 - Retail sale of footwear and leather goods in specialised stores	8	3			0	0			0	0			0	0			0	0			0	0			8,01	3,20		
9 46.42 - Wholesale of clothing and footwear	26	10			0	0			0	0			0	0			0	0			0	0			26,25	10,50		
10 46.75 - Wholesale of chemical products	0	0			104 317	13 040			0	0			0	0			0	0			0	0			104 316,84	13 039,60		

3.2 GAR KPI stock - capital expenditures-based- disclosure taking into account the value of mortgage loans aligned with the EU Taxonomy based on the approach described in the note "Household financing", point 3b).

		2023-12-31																												
		Climate Change Mitigation (CCM)			Climate Change Adaptation (CCA)			Water and marine resources (WTR)			Circular economy (CE)			Pollution (PPC)			Biodiversity and Ecosystems (BIO)			TOTAL (CCM + CCA + WTR + CE + PPC + BIO)										
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			Proportion of total assets covered				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Proportion of total assets covered				
		Of which Use of Proceeds	Of which transitional	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which transitional	Of which enabling	Of which Use of Proceeds	Of which transitional	Of which enabling
GAR - Covered assets in both numerator and denominator																														
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	41,20%	0,09%	0,00%	0,00%	0,00%	0,15%	0,01%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,01%	72,72%
2	Financial undertakings	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,04%
3	Credit institutions	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,04%
4	Loans and advances	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,04%
5	Debt securities, including UoP	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
6	Equity instruments	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
7	Other financial corporations	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
8	of which investment firms	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
9	Loans and advances	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
10	Debt securities, including UoP	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
11	Equity instruments	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
12	of which management companies	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
13	Loans and advances	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
14	Debt securities, including UoP	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
15	Equity instruments	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
16	of which insurance undertakings	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
17	Loans and advances	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
18	Debt securities, including UoP	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
19	Equity instruments	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
20	Non-financial undertakings	0,88%	0,09%	0,00%	0,00%	0,15%	0,01%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
21	Loans and advances	0,88%	0,09%	0,00%	0,00%	0,15%	0,01%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
22	Debt securities, including UoP	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
23	Equity instruments	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
24	Households	40,32%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
25	of which loans collateralised by residential immovable property	40,32%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
26	of which building renovation loans	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
27	of which motor vehicle loans	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
28	Local governments financing	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
29	Housing financing	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
30	Other local government financing	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
31	Collateral obtained by taking possession: residential and commercial immovable properties	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
32	Total GAR assets	41,20%	0,09%	0,00%	0,00%	0,00%	0,15%	0,01%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%

4.1 GAR KPI flow - turnover-based - disclosure taking into account the value of mortgage loans aligned with the EU Taxonomy based on the approach described in the note "Household financing", point 3b).

	2023-12-31																													
	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
	Proportion of total covered assets funding taxonomy relevant sectors					Proportion of total covered assets funding taxonomy relevant					Proportion of total covered assets funding taxonomy relevant				Proportion of total covered assets funding taxonomy relevant				Proportion of total covered assets funding taxonomy relevant				Proportion of total covered assets funding taxonomy relevant							
% (compared to flow of total eligible assets)	Proportion of total covered assets funding taxonomy relevant				Proportion of total covered assets funding taxonomy relevant				Proportion of total covered assets funding taxonomy relevant				Proportion of total covered assets funding taxonomy relevant				Proportion of total covered assets funding taxonomy relevant				Proportion of total covered assets funding taxonomy relevant				Proportion of total new assets covered					
	Of which Use of Proceeds	Of which transitional	Of which enabling	Of which enabling	Of which Use of Proceeds	Of which transitional	Of which enabling	Of which enabling	Of which Use of Proceeds	Of which transitional	Of which enabling	Of which enabling	Of which Use of Proceeds	Of which transitional	Of which enabling	Of which enabling	Of which Use of Proceeds	Of which transitional	Of which enabling	Of which enabling	Of which Use of Proceeds	Of which transitional	Of which enabling	Of which enabling		Of which Use of Proceeds	Of which transitional	Of which enabling	Of which enabling	
GAR - Covered assets in both numerator and denominator																														
1	Loans and advances, debt securities and equity instruments not HTF eligible for GAR calculation	18,53%	0,91%	0,88%	0,04%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	50,67%
2	Financial undertakings	0,03%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,24%
3	Credit institutions	0,03%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,24%
4	Loans and advances	0,03%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,24%	
5	Debt securities, including UoP	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
6	Equity instruments	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
7	Other financial corporations	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
8	Of which investment firms	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
9	Loans and advances	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
10	Debt securities, including UoP	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
11	Equity instruments	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
12	Of which management companies	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
13	Loans and advances	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
14	Debt securities, including UoP	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
15	Equity instruments	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
16	Of which insurance undertakings	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
17	Loans and advances	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
18	Debt securities, including UoP	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
19	Equity instruments	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
20	Non-financial undertakings	0,50%	0,04%	0,00%	0,04%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	8,05%
21	Loans and advances	0,50%	0,04%	0,00%	0,04%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	8,05%
22	Debt securities, including UoP	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
23	Equity instruments	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
24	Households	18,00%	0,88%	0,88%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	42,37%
25	Of which loans collateralised by residential immovable property	18,00%	0,88%	0,88%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	14,07%
26	Of which building renovation loans	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
27	Of which motor vehicle loans	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
28	Local governments financing	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
29	Housing financing	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
30	Other local government financing	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
31	Collateral obtained by taking possession: residential and commercial immovable properties	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
32	Total GAR assets	18,53%	0,91%	0,88%	0,04%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	100,00%	

* In Table 4.1, the Group only includes exposures that were recognized in the Group's accounting records for the first time in 2023.

4.2 GAR KPI flow - capital expenditures-based - disclosure taking into account the value of mortgage loans aligned with the EU Taxonomy based on the approach described in the note "Household financing", point 3b).

	2023-12-31																														
	Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)						
	Proportion of total covered assets funding taxonomy relevant sectors				Proportion of total covered assets funding taxonomy relevant				Proportion of total covered assets funding taxonomy relevant				Proportion of total covered assets funding taxonomy relevant				Proportion of total covered assets funding taxonomy relevant				Proportion of total covered assets funding taxonomy relevant sectors										
% (compared to flow of total eligible assets)	Proportion of total covered assets funding taxonomy relevant			Proportion of total covered assets funding			Proportion of total covered assets funding			Proportion of total covered assets funding			Proportion of total covered assets funding			Proportion of total covered assets funding			Proportion of total covered assets funding taxonomy relevant sectors			Proportion of total covered assets funding taxonomy relevant			Proportion of total new assets covered						
	Of which Use of Proceeds	Of which transitional	Of which enabling	Of which Use of Proceeds	Of which transitional	Of which enabling	Of which Use of Proceeds	Of which transitional	Of which enabling	Of which Use of Proceeds	Of which transitional	Of which enabling	Of which Use of Proceeds	Of which transitional	Of which enabling	Of which Use of Proceeds	Of which transitional	Of which enabling	Of which Use of Proceeds	Of which transitional	Of which enabling	Of which Use of Proceeds	Of which transitional	Of which enabling							
GAR - Covered assets in both numerator and denominator																															
1 Loans and advances, debt securities and equity instruments not HT eligible for GAR calculation	20,47%	1,26%	0,88%	0,01%	0,01%	0,04%	0,01%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	20,51%	1,26%	0,88%	0,01%	0,01%	50,67%
2 Financial undertakings	0,02%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,02%	0,00%	0,00%	0,00%	0,00%	0,24%
3 Credit institutions	0,02%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,02%	0,00%	0,00%	0,00%	0,00%	0,24%
4 Loans and advances	0,02%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,02%	0,00%	0,00%	0,00%	0,00%	0,24%
5 Debt securities, including UoP	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
6 Equity instruments	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
7 Other financial corporations	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
8 of which investment firms	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
9 Loans and advances	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
10 Debt securities, including UoP	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
11 Equity instruments	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
12 of which management companies	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
13 Loans and advances	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
14 Debt securities, including UoP	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
15 Equity instruments	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
16 of which insurance undertakings	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
17 Loans and advances	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
18 Debt securities, including UoP	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
19 Equity instruments	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
20 Non-financial undertakings	2,46%	0,38%	0,00%	0,01%	0,01%	0,04%	0,01%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	2,50%	0,39%	0,00%	0,01%	0,01%	8,05%
21 Loans and advances	2,46%	0,38%	0,00%	0,01%	0,01%	0,04%	0,01%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	2,50%	0,39%	0,00%	0,01%	0,01%	8,05%
22 Debt securities, including UoP	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
23 Equity instruments	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
24 Households	18,00%	0,88%	0,88%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	18,00%	0,88%	0,88%	0,00%	0,00%	42,37%
25 of which loans collateralised by residential immovable property	18,00%	0,88%	0,88%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	18,00%	0,88%	0,88%	0,00%	0,00%	14,07%
26 of which building renovation loans	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,37%
27 of which motor vehicle loans	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
28 Local governments financing	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
29 Housing financing	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
30 Other local government financing	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
31 Collateral obtained by taking possession: residential and commercial immovable properties	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
32 Total GAR assets	20,47%	1,26%	0,88%	0,01%	0,01%	0,04%	0,01%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	20,51%	1,26%	0,88%	0,01%	0,01%	100,00%

* In Table 4.2, the Group only includes exposures that were recognized in the Group's accounting records for the first time in 2023.

5.1 KPI off-balance sheet exposures - turnover-based

% (compared to total eligible off-balance sheet assets)	2023-12-31																														
	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					
	Proportion of total covered assets funding taxonomy relevant sectors					Proportion of total covered assets funding taxonomy				Proportion of total covered assets funding taxonomy				Proportion of total covered assets funding taxonomy				Proportion of total covered assets funding taxonomy				Proportion of total covered assets funding taxonomy relevant sectors									
	Proportion of total covered assets funding taxonomy					Proportion of total covered assets funding				Proportion of total covered assets funding				Proportion of total covered assets funding				Proportion of total covered assets funding				Proportion of total covered assets funding taxonomy									
	Of which Use of Proceeds	Of which transitional	Of which enabling		Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which transitional	Of which enabling		Of which Use of Proceeds	Of which transitional	Of which enabling		
1 Financial guarantees (FinGuar KPI)	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%		
2 Assets under management (AuM KPI)	6,10%	0,91%	0,00%	0,00%	0,62%	0,07%	0,09%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	6,17%	1,00%	0,00%	0,00%	0,62%

5.2 KPI off-balance sheet exposures - capital expenditures-based

% (compared to total eligible off-balance sheet assets)	2023-12-31																														
	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					
	Proportion of total covered assets funding taxonomy relevant sectors					Proportion of total covered assets funding taxonomy				Proportion of total covered assets funding taxonomy				Proportion of total covered assets funding taxonomy				Proportion of total covered assets funding taxonomy				Proportion of total covered assets funding taxonomy relevant sectors									
	Proportion of total covered assets funding taxonomy					Proportion of total covered assets funding				Proportion of total covered assets funding				Proportion of total covered assets funding				Proportion of total covered assets funding				Proportion of total covered assets funding taxonomy									
	Of which Use of Proceeds	Of which transitional	Of which enabling		Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which enabling		Of which Use of Proceeds	Of which transitional	Of which enabling		Of which Use of Proceeds	Of which transitional	Of which enabling		
1 Financial guarantees (FinGuar KPI)	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%		
2 Assets under management (AuM KPI)	7,11%	3,13%	0,00%	0,10%	2,28%	0,22%	0,19%	0,00%	0,02%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	7,33%	3,32%	0,00%	0,10%	2,30%

As explained in the descriptive note “Household financing”, we also present disclosures in the tables below, which take into account the value of mortgage loans aligned with the EU Taxonomy based on the approach described in the note “Household financing”, point 3a):

1.0 Summary of key performance indicators to be disclosed by credit institutions under Article 8 of the Taxonomy Regulation

1.1 Assets for the calculation of the Green Asset Ratio - turnover-based

1.2 Assets for the calculation of the Green Asset Ratio - capital expenditures-based

3.1 GAR KPI stock - turnover-based

3.2 GAR KPI stock - capital expenditures-based

4.1 GAR KPI flow - turnover-based

4.2 GAR KPI flow - capital expenditures-based

1.0 Summary of key performance indicators to be disclosed by credit institutions under Article 8 of the Taxonomy Regulation- disclosure taking into account the value of mortgage loans aligned with the EU Taxonomy based on the approach described in the note "Household financing", point 3a).

	Total environmentally sustainable assets (PLN '000)	KPI****	KPI*****	% coverage (over total assets)***	% of assets excluded from the numerator of the GAR (Article 7 (2) and (3) and Section 1.1.2. of Annex V)	% of assets excluded from the denominator of the GAR (Article 7 (1)) and Section 1.2.4 of Annex V)
Main KPI						
Green asset ratio (GAR) stock	5 733 748	6,86%	6,92%	65,30%	17,82%	34,70%

	Total environmentally sustainable activities (PLN '000)	KPI	KPI	% coverage (over total assets)	% of assets excluded from the numerator of the GAR (Article 7 (2) and (3) and Section 1.1.2. of Annex V)	% of assets excluded from the denominator of the GAR (Article 7 (1)) and Section 1.2.4 of Annex V)
Additional KPIs						
GAR (flow)	168 727	0,91%	1,26%	33,50%	16,52%	49,53%
<i>Trading book*</i>	n/a	n/a	n/a			
<i>Financial guarantees</i>	0	0,00%	0,00%			
<i>Assets under management</i>	29 146	1,00%	3,32%			
<i>Fees and commissions income**</i>	n/a	n/a	n/a			

* For credit institutions that do not meet the conditions of Article 94(1) of the CRR or the conditions set out in Article 325a(1) of the CRR

**Fees and commissions income from services other than lending and AuM

*** % of assets covered by the KPI over banks' total assets

****based on the Turnover KPI of the counterparty

*****based on the CapEx KPI of the counterparty, except for lending activities where for general lending Turnover KPI is used

3.1 GAR KPI stock - turnover-based- disclosure taking into account the value of mortgage loans aligned with the EU Taxonomy based on the approach described in the note "Household financing", point 3a).

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	r	s	t	u	v	w	x	y	z	aa	ab	ac	ad	ae	af		
		2023-12-31																																	
		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				Proportion of total assets covered					
Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)													
Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)													
		Of which Use of Proceeds		Of which transitional	Of which enabling	Of which Use of Proceeds		Of which transitional	Of which enabling	Of which Use of Proceeds		Of which transitional	Of which enabling	Of which Use of Proceeds		Of which transitional	Of which enabling	Of which Use of Proceeds		Of which transitional	Of which enabling	Of which Use of Proceeds		Of which transitional	Of which enabling	Of which Use of Proceeds		Of which transitional	Of which enabling		Of which Use of Proceeds		Of which transitional	Of which enabling	
GAR - Covered assets in both numerator and denominator																																			
1	Loans and advances, debt securities and equity instruments not HTF eligible for GAR calculation	40,67%	6,84%	6,83%	0,01%	0,00%	0,13%	0,02%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	72,72%
2	Financial undertakings	0,01%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
3	Credit institutions	0,01%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
4	Loans and advances	0,01%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
5	Debt securities, including UoP	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
6	Equity instruments	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
7	Other financial corporations	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
8	Of which investment firms	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
9	Loans and advances	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
10	Debt securities, including UoP	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
11	Equity instruments	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
12	Of which management companies	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
13	Loans and advances	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
14	Debt securities, including UoP	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
15	Equity instruments	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
16	Of which insurance undertakings	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
17	Loans and advances	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
18	Debt securities, including UoP	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
19	Equity instruments	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
20	Non-financial undertakings	0,35%	0,01%	0,00%	0,01%	0,00%	0,13%	0,02%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	2,69%	
21	Loans and advances	0,35%	0,01%	0,00%	0,01%	0,00%	0,13%	0,02%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	2,69%	
22	Debt securities, including UoP	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
23	Equity instruments	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
24	Households	40,32%	6,83%	6,83%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	69,96%	
25	of which loans collateralised by residential immovable property	40,32%	6,83%	6,83%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	47,49%	
26	of which building renovation loans	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
27	of which motor vehicle loans	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
28	Local governments financing	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%		
29	Housing financing	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%		
30	Other local government financing	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%		
31	Collateral obtained by taking possession: residential and commercial immovable properties	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%		
32	Total GAR assets	40,67%	6,84%	6,83%	0,01%	0,00%	0,13%	0,02%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	100,00%		

4.1 GAR KPI flow - turnover-based - disclosure taking into account the value of mortgage loans aligned with the EU Taxonomy based on the approach described in the note "Household financing", point 3a).

	2023-12-31																														
	Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and marine resources (WMR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WMR + CE + PPC + BIO)						
	Proportion of total covered assets funding taxonomy relevant sectors		Proportion of total covered assets funding taxonomy relevant		Proportion of total covered assets funding taxonomy relevant		Proportion of total covered assets funding taxonomy relevant		Proportion of total covered assets funding taxonomy relevant		Proportion of total covered assets funding taxonomy relevant		Proportion of total covered assets funding taxonomy relevant		Proportion of total covered assets funding taxonomy relevant		Proportion of total covered assets funding taxonomy relevant		Proportion of total covered assets funding taxonomy relevant		Proportion of total covered assets funding taxonomy relevant		Proportion of total covered assets funding taxonomy relevant		Proportion of total covered assets funding taxonomy relevant		Proportion of total covered assets funding taxonomy relevant				
a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	r	s	t	u	v	w	x	y	z	aa	ab	ac	ad	ae	af
GAR - Covered assets in both numerator and denominator																															
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	18,53%	0,91%	0,88%	0,04%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	50,67%
2	Financial undertakings	0,03%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,24%
3	Credit institutions	0,03%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,24%	
4	Loans and advances	0,03%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,24%	
5	Debt securities, including UoP	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
6	Equity instruments	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
7	Other financial corporations	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
8	of which investment firms	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
9	Loans and advances	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
10	Debt securities, including UoP	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
11	Equity instruments	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
12	of which management companies	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
13	Loans and advances	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
14	Debt securities, including UoP	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
15	Equity instruments	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
16	of which insurance undertakings	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
17	Loans and advances	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
18	Debt securities, including UoP	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
19	Equity instruments	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
20	Non-financial undertakings	0,50%	0,04%	0,00%	0,04%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	8,65%	
21	Loans and advances	0,50%	0,04%	0,00%	0,04%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	8,65%	
22	Debt securities, including UoP	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
23	Equity instruments	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
24	Households	18,00%	0,88%	0,88%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	42,37%	
25	of which loans collateralised by residential immovable property	18,00%	0,88%	0,88%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	14,07%	
26	of which building renovation loans	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,37%	
27	of which motor vehicle loans	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
28	Local governments financing	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
29	Housing financing	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
30	Other local government financing	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
31	Collateral obtained by taking possession: residential and commercial immovable properties	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
32	Total GAR assets	18,53%	0,91%	0,88%	0,04%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	100,00%	

* In Table 4.1, the Group only includes exposures that were recognized in the Group's accounting records for the first time in 2023.

4.2 GAR KPI flow - capital expenditures-based - disclosure taking into account the value of mortgage loans aligned with the EU Taxonomy based on the approach described in the note "Household financing", point 3a).

	2023-12-31																																				
	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					Water and marine resources (WMR)					Circular economy (CE)					Pollution (PPC)					Biodiversity and Ecosystems (BIO)					TOTAL (CCM + CCA + WMR + CE + PPC + BIO)						
	Proportion of total covered assets funding taxonomy relevant sectors					Proportion of total covered assets funding taxonomy relevant					Proportion of total covered assets funding taxonomy relevant					Proportion of total covered assets funding taxonomy relevant					Proportion of total covered assets funding taxonomy relevant					Proportion of total covered assets funding taxonomy relevant sectors											
	Proportion of total covered assets funding taxonomy relevant		Of which Use of Proceeds		Of which transitional	Of which enabling	Proportion of total covered assets funding		Of which Use of Proceeds		Of which enabling	Proportion of total covered assets funding		Of which Use of Proceeds		Of which enabling	Proportion of total covered assets funding		Of which Use of Proceeds		Of which enabling	Proportion of total covered assets funding		Of which Use of Proceeds		Of which enabling	Proportion of total covered assets funding taxonomy relevant		Of which Use of Proceeds		Of which transitional	Of which enabling	Proportion of total new assets covered				
GAR - Covered assets in both numerator and denominator																																					
1	Loans and advances, debt securities and equity instruments not HTF eligible for GAR calculation	20,47%	1,26%	0,88%	0,01%	0,01%	0,04%	0,01%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	20,51%	1,26%	0,88%	0,01%	0,01%	50,67%
2	Financial undertakings	0,02%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,24%	
3	Credit institutions	0,02%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,24%		
4	Loans and advances	0,02%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,24%			
5	Debt securities, including UoP	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%		
6	Equity instruments	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%		
7	Other financial corporations	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
8	of which investment firms	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
9	Loans and advances	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
10	Debt securities, including UoP	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
11	Equity instruments	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
12	of which management companies	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
13	Loans and advances	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
14	Debt securities, including UoP	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
15	Equity instruments	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
16	of which insurance undertakings	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
17	Loans and advances	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
18	Debt securities, including UoP	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
19	Equity instruments	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	
20	Non-financial undertakings	2,46%	0,38%	0,00%	0,01%	0,01%	0,04%	0,01%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	8,05%
21	Loans and advances	2,46%	0,38%	0,00%	0,01%	0,01%	0,04%	0,01%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	8,05%	
22	Debt securities, including UoP	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%		
23	Equity instruments	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%		
24	Households	18,00%	0,88%	0,88%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	42,37%	
25	of which loans collateralised by residential immovable property	18,00%	0,88%	0,88%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	14,07%		
26	of which building renovation loans	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,37%		
27	of which motor vehicle loans	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%		
28	Local governments financing	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%		
29	Housing financing	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%		
30	Other local government financing	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%		
31	Collateral obtained by taking possession: residential and commercial immovable properties	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%		
32	Total GAR assets	20,47%</																																			

Quantitative disclosures prepared in accordance with the formulas laid down in Annex XII of Regulation 2021/2178 - Nuclear and fossil gas related disclosures

The Group has reviewed its portfolio to identify exposures that finance any of the nuclear energy or fossil gas related activities listed in Regulation 2022/1214.

The Group has not identified any use-of-proceeds / investment financing for these purposes. However, the Group has identified general purpose financing related to the fossil gas related activity of the Group’s clients. The identification was based on key performance indicators published by the Group’s clients in this respect.

Relevant quantitative disclosures related to the financing of the above activities is presented below¹⁰.

Nuclear energy and fossil gas related activities

Nuclear and fossil gas related activities

Row	Nuclear energy related activities	
1.	The Bank funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	NO
2.	The Bank funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	NO
3.	The Bank funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	NO
Fossil gas related activities		
4.	The Bank funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	NO
5.	The Bank funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	NO
6.	The Bank funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	NO

¹⁰ The Group does not disclose tables derived from Template 5 of Annex XII to Regulation 2021/2178, due to limited informational value of these templates for banking activities (the Group has not identified a method for reporting Taxonomy-non-eligible activities while at the same time, as specified in template, allocating them to the specific taxonomy activities 4.26-4.31). The Group believes that the tables presented above present the full picture of the Group’s activity related to the financing of the activities referred to in the above annex

Taxonomy-aligned economic activity (denominator) - turnover-based - disclosure taking into account the value of mortgage loans aligned with the EU Taxonomy based on the approach described in the note "Household financing", point 3b).

Row	Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0,00%	0	0,00%	0	0,00%
2.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0,00%	0	0,00%	0	0,00%
3.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0,00%	0	0,00%	0	0,00%
4.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0,00%	0	0,00%	0	0,00%
5.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0,00%	0	0,00%	0	0,00%
6.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	13 041	0,00%	0	0,00%	13 041	0,00%
7.	Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	12 628	0,00%	8 736	0,00%	3 892	0,00%
8.	Total applicable KPI	25 669	0,00%	8 736	0,00%	16 933	0,00%

Taxonomy-aligned economic activity (numerator) - turnover-based - disclosure taking into account the value of mortgage loans aligned with the EU Taxonomy based on the approach described in the note "Household financing", point 3b).

Row	Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0	0,00%	0	0,00%	0	0,00%
2.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0	0,00%	0	0,00%	0	0,00%
3.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0	0,00%	0	0,00%	0	0,00%
4.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0	0,00%	0	0,00%	0	0,00%
5.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0	0,00%	0	0,00%	0	0,00%
6.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	13 041	50,81%	0	0,00%	13 041	77,02%
7.	Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the applicable KPI	12 628	49,19%	8 736	100,00%	3 892	22,98%
8.	Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI	25 669	100,00%	8 736	100,00%	16 933	100,00%

Taxonomy-eligible but not Taxonomy-aligned economic activity - in terms of turnover - disclosure taking into account the value of mortgage loans aligned with the EU Taxonomy based on the approach described in the note "Household financing", point 3b).

Row	Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0,00%	0	0,00%	0	0,00%
2.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0,00%	0	0,00%	0	0,00%
3.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0,00%	0	0,00%	0	0,00%
4.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0,00%	0	0,00%	0	0,00%
5.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	563	0,00%	563	0,00%	0	0,00%
6.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0,00%	0	0,00%	0	0,00%
7.	Amount and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	34 097 779	0,04%	34 003 203	0,04%	94 576	0,00%
8.	Total amount and proportion of taxonomy eligible but not taxonomy-aligned economic activities in the denominator of the applicable KPI	34 098 342	0,04%	34 003 766	0,04%	94 576	0,00%

Taxonomy-aligned economic activity (denominator) - capital expenditures-based - disclosure taking into account the value of mortgage loans aligned with the EU Taxonomy based on the approach described in the note "Household financing", point 3b).

Row	Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0,00%	0	0,00%	0	0,00%
2.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0,00%	0	0,00%	0	0,00%
3.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0,00%	0	0,00%	0	0,00%
4.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0,00%	0	0,00%	0	0,00%
5.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0,00%	0	0,00%	0	0,00%
6.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0,00%	0	0,00%	0	0,00%
7.	Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	77 487	0,00%	72 847	0,00%	4 639	0,00%
8.	Total applicable KPI	77 487	0,00%	72 847	0,00%	4 639	0,00%

Taxonomy-aligned economic activity (numerator) - capital expenditures-based - disclosure taking into account the value of mortgage loans aligned with the EU Taxonomy based on the approach described in the note "Household financing", point 3b).

Row	Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0	0,00%	0	0,00%	0	0,00%
2.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0	0,00%	0	0,00%	0	0,00%
3.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0	0,00%	0	0,00%	0	0,00%
4.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0	0,00%	0	0,00%	0	0,00%
5.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0	0,00%	0	0,00%	0	0,00%
6.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0	0,00%	0	0,00%	0	0,00%
7.	Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the applicable KPI	77 487	100,00%	72 847	100,00%	4 639	100,00%
8.	Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI	77 487	100,00%	72 847	100,00%	4 639	100,00%

Taxonomy-eligible but not Taxonomy-aligned economic activity - capital expenditures-based - disclosure taking into account the value of mortgage loans aligned with the EU Taxonomy based on the approach described in the note "Household financing", point 3b).

Row	Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0,00%	0	0,00%	0	0,00%
2.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0,00%	0	0,00%	0	0,00%
3.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0,00%	0	0,00%	0	0,00%
4.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	613	0,00%	613	0,00%	0	0,00%
5.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	844	0,00%	844	0,00%	0	0,00%
6.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0,00%	0	0,00%	0	0,00%
7.	Amount and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	34 498 400	0,04%	34 376 640	0,04%	121 760	0,00%
8.	Total amount and proportion of taxonomy eligible but not taxonomy-aligned economic activities in the denominator of the applicable KPI	34 499 858	0,04%	34 378 097	0,04%	121 760	0,00%

As explained in the descriptive note “Household financing”, we also present disclosures in the tables below, which take into account the value of mortgage loans aligned with the EU Taxonomy based on the approach described in the note “Household financing”, point 3a).

Taxonomy-aligned economic activity (denominator) - turnover-based - disclosure taking into account the value of mortgage loans aligned with the EU Taxonomy based on the approach described in the note “Household financing”, point 3a).

Row	Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0,00%	0	0,00%	0	0,00%
2.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0,00%	0	0,00%	0	0,00%
3.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0,00%	0	0,00%	0	0,00%
4.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0,00%	0	0,00%	0	0,00%
5.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0,00%	0	0,00%	0	0,00%
6.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	13 041	0,00%	0	0,00%	13 041	0,00%
7.	Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	5 720 706	0,01%	5 716 814	0,01%	3 892	0,00%
8.	Total applicable KPI	5 733 748	0,01%	5 716 814	0,01%	16 933	0,00%

Taxonomy-aligned economic activity (numerator) - turnover-based - disclosure taking into account the value of mortgage loans aligned with the EU Taxonomy based on the approach described in the note “Household financing”, point 3a).

Row	Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0	0,00%	0	0,00%	0	0,00%
2.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0	0,00%	0	0,00%	0	0,00%
3.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0	0,00%	0	0,00%	0	0,00%
4.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0	0,00%	0	0,00%	0	0,00%
5.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0	0,00%	0	0,00%	0	0,00%
6.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	13 041	0,23%	0	0,00%	13 041	77,02%
7.	Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the applicable KPI	5 720 706	99,77%	5 716 814	100,00%	3 892	22,98%
8.	Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI	5 733 748	100,00%	5 716 814	100,00%	16 933	100,00%

Taxonomy-eligible but not Taxonomy-aligned economic activity - in terms of turnover - disclosure taking into account the value of mortgage loans aligned with the EU Taxonomy based on the approach described in the note "Household financing", point 3a).

Row	Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0,00%	0	0,00%	0	0,00%
2.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0,00%	0	0,00%	0	0,00%
3.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0,00%	0	0,00%	0	0,00%
4.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0,00%	0	0,00%	0	0,00%
5.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	563	0,00%	563	0,00%	0	0,00%
6.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0,00%	0	0,00%	0	0,00%
7.	Amount and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	28 389 701	0,03%	28 295 125	0,03%	94 576	0,00%
8.	Total amount and proportion of taxonomy eligible but not taxonomy-aligned economic activities in the denominator of the applicable KPI	28 390 263	0,03%	28 295 687	0,03%	94 576	0,00%

Taxonomy-aligned economic activity (denominator) - capital expenditures-based - disclosure taking into account the value of mortgage loans aligned with the EU Taxonomy based on the approach described in the note "Household financing", point 3a).

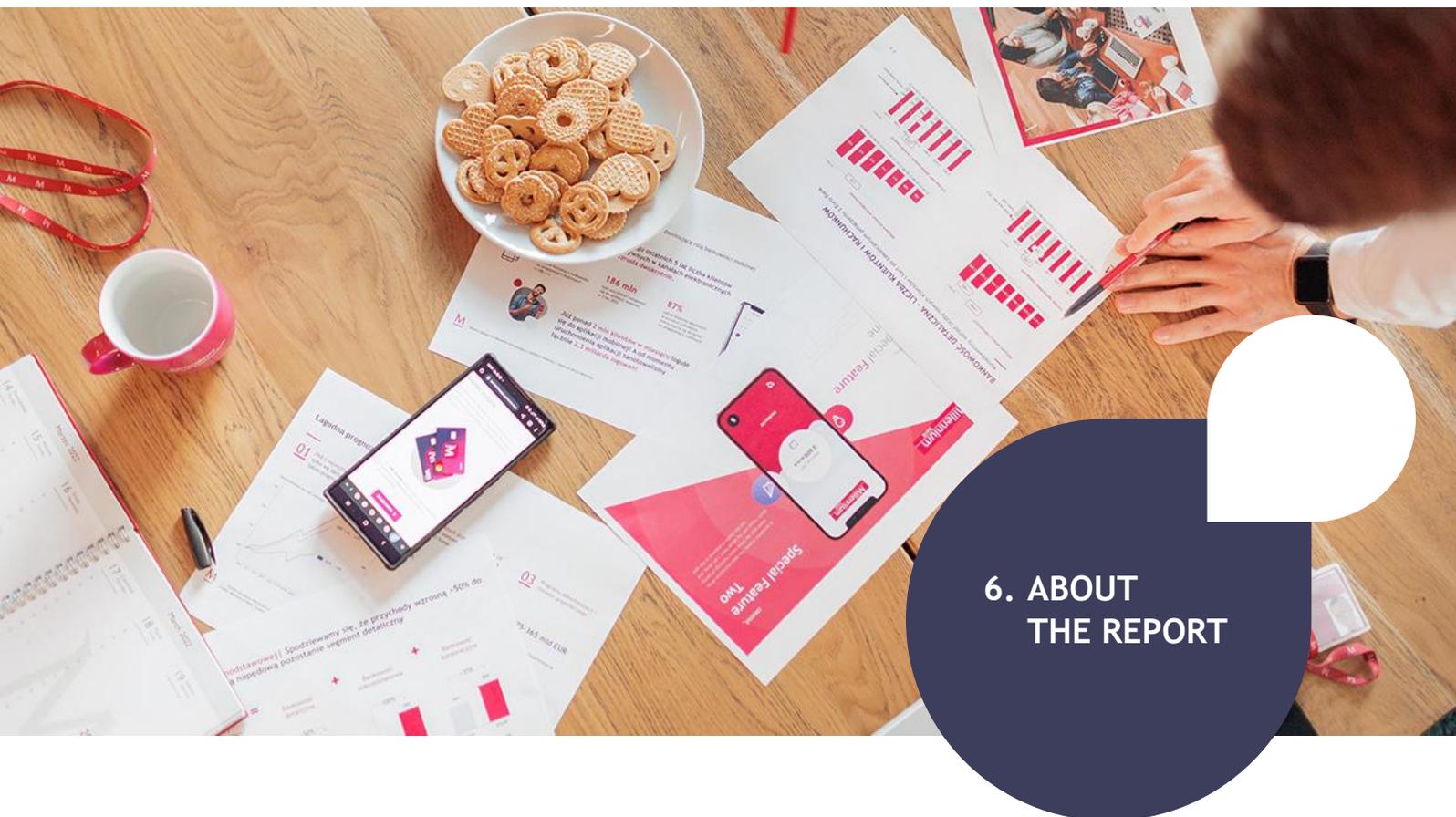
Row	Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0,00%	0	0,00%	0	0,00%
2.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0,00%	0	0,00%	0	0,00%
3.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0,00%	0	0,00%	0	0,00%
4.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0,00%	0	0,00%	0	0,00%
5.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0,00%	0	0,00%	0	0,00%
6.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0,00%	0	0,00%	0	0,00%
7.	Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	5 785 565	0,01%	5 780 925	0,01%	4 639	0,00%
8.	Total applicable KPI	5 785 565	0,01%	5 780 925	0,01%	4 639	0,00%

Taxonomy-aligned economic activity (numerator) - capital expenditures-based - disclosure taking into account the value of mortgage loans aligned with the EU Taxonomy based on the approach described in the note "Household financing", point 3a).

Row	Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0	0,00%	0	0,00%	0	0,00%
2.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0	0,00%	0	0,00%	0	0,00%
3.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0	0,00%	0	0,00%	0	0,00%
4.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0	0,00%	0	0,00%	0	0,00%
5.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0	0,00%	0	0,00%	0	0,00%
6.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0	0,00%	0	0,00%	0	0,00%
7.	Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the applicable KPI	5 785 565	100,00%	5 780 925	100,00%	4 639	100,00%
8.	Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI	5 785 565	100,00%	5 780 925	100,00%	4 639	100,00%

Taxonomy-eligible but not Taxonomy-aligned economic activity - capital expenditures-based - disclosure taking into account the value of mortgage loans aligned with the EU Taxonomy based on the approach described in the note "Household financing", point 3a).

Row	Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0,00%	0	0,00%	0	0,00%
2.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0,00%	0	0,00%	0	0,00%
3.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0,00%	0	0,00%	0	0,00%
4.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	613	0,00%	613	0,00%	0	0,00%
5.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	844	0,00%	844	0,00%	0	0,00%
6.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0,00%	0	0,00%	0	0,00%
7.	Amount and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	28 790 322	0,03%	28 668 562	0,03%	121 760	0,00%
8.	Total amount and proportion of taxonomy eligible but not taxonomy-aligned economic activities in the denominator of the applicable KPI	28 791 779	0,03%	28 670 019	0,03%	121 760	0,00%



6. ABOUT THE REPORT

6.1. APPROACH TO REPORTING

About this report

[GRI 2-3] The ESG Report of Bank Millennium and the Bank Millennium Group depicts the operations of the Bank Millennium Group in the period from 1 January 2023 to 31 December 2023 unless stated otherwise. The Report was published on 28 February 2023. This report has been drafted in accordance with the GRI Standards (the sectoral supplement to financial services was also applied) and in accordance with the non-financial reporting requirements imposed by the amended Accounting Act. The report constitutes the report on non-financial information referred to in Article 49b of the Act. It contains a recap of the Bank Millennium Group's activity in the sustainable development context, i.e. in the economic, social and environmental areas. **[GRI 2-3]** The Bank Millennium Group publishes reports at annual intervals. The most recent report prepared for 2022 was published in February 2023. The Bank published its first corporate social responsibility report for 2006. **[GRI 2-2]** The report describes the activities of the Bank Millennium and all companies of the Bank Millennium Group (presented in the graphic as part of the **GRI 2-1** indicator on page 8 of this report), excluding companies in liquidation. The report also includes changes in the structure of the Bank Millennium Group, related to the sale of 80% of shares of Millennium Financial Services sp z o.o., described in chapter 1.1. "Organization Profile". This change did not affect the data consolidation methodology used. With regard to significant issues, the approach applicable to all subsidiaries covered by reporting is presented. The scope of entities covered by this report does not differ from the scope of entities covered by financial reporting. This report does not contain any corrections to information regarding minority interests. **[GRI 2-6]** The change in the Bank Millennium Group's structure involving the sale of 80% of shares of Millennium Financial Services sp z o.o. is described in section 1.1. "Profile of the Organization".

[GRI 2-4] Compared to the last publication for 2021, there were no changes in the scope and coefficient of the report.

[GRI 2-14] The process of preparation of this report (preparation and/or verification and approval of content) involved both the heads of the respective organizational units of the Bank and the Group and members of the management boards of both the Bank and the Group companies. This process was pursued during meetings devoted to discussing the content of the report and via e-mail.

Furthermore, the said individuals participated in the process of selecting significant reporting topics by participating in the stakeholder opinion survey, as described in detail in section 1.8. “Defining the content of the report - dialogue with stakeholders”, and through working arrangements made as part of the work of the Sustainability Committee.

[GRI 2-5] The ESG Report of the Bank Millennium Group has been audited in the form of an independent assurance service in respect of selected profile indicators and selected material performance indicators, marked “YES” in the GRI table. The assurance service was provided by Deloitte Audyt Sp. z o.o. sp.k., which also serves as a statutory auditor in respect of the financial statements of the Bank and the Bank Millennium Group. The auditor selection process was conducted in compliance with the “Audit firm selection and cooperation policy” and was coordinated by the Sustainable Development Department in cooperation with the Compliance Department, while the selection of the auditor was made by the Bank’s Management Board and then approved by the Audit Committee of the Bank Millennium Supervisory Board.

An audit in the form of an independent assurance engagement provides limited assurance in accordance with the International Standard on Assurance Engagements 3000 (“Revised ISAE 3000”), applicable to assurance engagements other than audits or reviews of historical financial information, as published by the International Auditing and Assurance Standards Board (“IAASB”). Such services do not constitute financial audit activities within the meaning of the Act of 11 May 2017 on Statutory Auditors, Audit Firms and Public Supervision. Deloitte Audyt Sp. z o.o. sp. k. is a party unrelated to Bank Millennium S.A.

The report on the provision of an independent assurance service is available on the website of Bank Millennium S.A.

6.2. ACCOUNTING ACT COMPLIANCE TABLE

Mandatory items from the Accounting Act	Group (page)	Bank (page)
Description of the business model	13	13
Description of the policy on combating corruption. Significant risks adversely affecting the issue of combating corruption.	20-25,197-198	20-25,197-198
Description of the policy on human rights. Significant risks adversely affecting the issue of human rights.	20-25,180-182	20-25,180-182
Description of the policy on social issues. Significant risks adversely affecting social issues.	20-25,162	20-25,162
Description of the policy on employee issues. Significant risks adversely affecting employee issues.	134-139	134-139
Description of the policy on environmental issues. Significant risks adversely affecting environmental issues	25-37,49-50	25-37,49-50

6.3. GRI STANDARDS CONTENT INDEX

Statement of use: Bank Millennium Group has reported in accordance with the GRI Standards for the period from 1 January 2023 to 31 December 2023.

GRI 1 used: GRI 1: Foundation 2021

GRI STANDARD/ OTHER SOURCE	NO. OF INDICA- TOR	THE NAME OF INDICATOR	LOCATION	OMISSION			INDEPEN- DENT ASSURANCE
				REQUIREMEN T(S) OMITTED	REASON	EXPLANATION	
GENERAL DISCLOSURES							
GRI 2: General Disclosures 2021	The organization and its reporting practices						
	2-1	Organizational details	7, 8				
	2-2	Entities included in the organization's sustainability reporting	232				YES
	2-3	Reporting period, frequency and contact point	232, 244				
	2-4	Restatements of information	233				
	2-5	External assurance	233				
	Activities and workers						
	2-6	Activities, value chain and other business relationships	7, 8, 9, 232				
	2-7	Employees	129				YES
	2-8	Workers who are not employees	133				
	Governance						
	2-9	Governance structure and composition	171, 172, 173, 174				
	2-10	Nomination and selection of the highest governance body	155				
	2-11	Chair of the highest governance body	173, 174				
	2-12	Role of the highest governance body in overseeing the management of impacts	20, 177				YES
	2-13	Delegation of responsibility for managing impacts	177				
2-14	Role of the highest governance body in sustainability reporting	233				YES	
2-15	Conflicts of interest	196					
2-16	Communication of critical concerns	195					

	2-17	Collective knowledge of the highest governance body	177				
	2-18	Evaluation of the performance of the highest governance body	155				
	2-19	Remuneration policies	137				
	2-20	Process to determine remuneration	136, 138				
	2-21	Annual total compensation ratio	138				
Strategy, policies and practices							
	2-22	Statement on sustainable development strategy	5				
	2-23	Policy commitments	21, 25				YES
	2-24	Embedding policy commitments	24, 93				
	2-25	Processes to remediate negative impacts	178				
	2-26	Mechanisms for seeking advice and raising concerns	195, 198				YES
	2-27	Compliance with laws and regulations	93, 121, 122, 123, 124, 199				
	2-28	Membership associations	23, 95, 184				YES
Stakeholder engagement							
	2-29	Approach to stakeholder engagement	42, 46, 112, 159				YES
	2-30	Collective bargaining agreements	143				YES
MATERIAL TOPICS							
GRI 3: Material Topics 2021	3-1	Process to determine material topics	42				
	3-2	List of material topics	42, 46				
	3-3	Management of material topics	46				YES
Employment							
GRI 3: Material Topics 2021	3-3	Management of material topics	134, 153, 154, 157				YES
GRI 401: Employment 2016	401-1	New employee hires and employee turnover	130				YES
	401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	153, 157				YES
	401-3	Parental leave	154				

Occupational Health and Safety								
GRI 3: Material Topics 2021	3-3	Management of material topics	157					YES
GRI 403: Occupational Health and Safety 2018	403-1	Occupational health and safety management system	157					
	403-2	Hazard identification, risk assessment, and incident investigation	157					
	403-3	Occupational health services	158					
	403-4	Worker participation, consultation, and communication on occupational health and safety	158					
	403-5	Worker training on occupational health and safety	158					
	403-6	Promotion of worker health	157, 157					
	403-7	Prevention and mitigation of occupational health and safety impact directly linked by business relationships	158					
	403-9	Work-related injuries	158					
Training and Education								
GRI 3: Material Topics 2021	3-3	Management of material topics	147					YES
GRI 404: Training and Education 2016	404-1	Average hours of training per year per employee	152					
	404-2	Programs for upgrading employee skills and transition assistance programs	150, 152					
	404-3	Percentage of employees receiving regular performance and career development reviews	144					YES
Marketing and Labeling, ethical sales								
GRI 3: Material Topics 2021	3-3	Management of material topics	120, 121, 124, 180					YES

GRI 417: Marketing and Labeling 2016	417-1	Requirements for product and service information and labeling	120, 122					
	417-3	Incidents of non-compliance concerning marketing communications	121					
Customer Privacy								
GRI 3: Material Topics 2021	3-3	Management of material topics	190					YES
GRI 418: Customer Privacy 2016	418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	192					YES
The availability of bank products and services, especially for those digitally excluded, as well as people with physical disabilities and seniors								
GRI 3: Material Topics 2021	3-3	Management of material topics	103, 104					YES
Own disclosure	Own disclosure 1	% of branches made accessible for people with physical disabilities	107					
	Own disclosure 2	% of franchises made accessible for people with physical disabilities	107					
	Own disclosure 3	% of ATM's made accessible for people with physical disabilities	107					
Innovation and development through the bank of new/cutting-edge technologies								
GRI 3: Material Topics 2021	3-3	Management of material topics	98					YES
Own disclosure	Own disclosure 4	Action taken in the area of innovative services	98					
Solutions in the area of security of funds entrusted to the bank								
GRI 3: Material Topics 2021	3-3	Management of material topics	188					YES

Own disclosure	Own disclosure 5	Safety and security actions	188					
	Own disclosure 6	Safety trainings	189					
Market Presence								
GRI 3: Material Topics 2021	3-3	Management of material topics	143					YES
GRI 202: Market Presence 2016	202-1	Ratios of standard entry level wage by gender compared to local minimum wage	143					YES
Supplier Environmental Assessment								
GRI 3: Material Topics 2021	3-3	Management of material topics	185					YES
GRI 308: Supplier Environmental Assessment 2016	308-1	New suppliers that were screened using environmental criteria	185					
The role of ESG factors in business strategy								
GRI 3: Material Topics 2021	3-3	Management of material topics	19					YES
Own disclosures	Own disclosure 10	ESG factors in business strategy	19					
Anti-corruption								
GRI 3: Material Topics 2021	3-3	Management of material topics	197, 198					YES
GRI 205: Anti-corruption 2016	205-1	Operations assessed for risks related to corruption	198					
	205-2	Communication and training about anti-corruption policies and procedures	198					YES
	205-3	Confirmed incidents of corruption and actions taken	198					YES
OTHER DISCLOSURES, NOT ASSIGNED TO MATERIAL TOPICS								
Economic performance								
GRI 201: Economic	201-1	Direct economic value generated and distributed	11					

performance 2016								
Indirect Economic Impacts								
GRI 203: Indirect Economic Impacts 2016	203-1	Infrastructure investments and services supported	162, 165					
Procurement Practices								
GRI 204: Procurement Practices 2016	204-1	Proportion of spending on local suppliers	185					
Anti-competitive Behavior								
GRI 206: Anti-competitive Behavior 2016	206-1	Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	199					YES
Tax								
GRI 207: Tax 2019	207-1	Approach to tax	187					
	207-2	Tax governance, control, and risk management	187					
	207-3	Stakeholder engagement and management of concerns related to tax	187					
Materials								
GRI 301: Materials 2016	301-1	Materials used by weight or volume	53, 54, 55					YES
Energy								
GRI 302: Energy 2016	302-1	Energy consumption within the organization	61-64					YES
	302-4	Reduction of energy consumption	76					
Water and Effluents								
GRI 303: Water and Effluents 2018	303-5	Water consumption	65					
Biodiversity								

GRI 304: Biodiversity 2016	304-1	Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	51					
Emissions								
GRI 305: Emissions 2016	305-1	Direct (Scope 1) GHG emissions	78-79, 81-82					YES
	305-2	Energy indirect (Scope 2) GHG emissions	78-79, 81-82					
	305-3	Other indirect (Scope 3) GHG emissions	78-79, 81-82					YES
	305-4	GHG emissions intensity	78-79, 81-82					
	305-5	Reduction of GHG emissions	84					
Waste								
GRI 306: Waste 2020	306-1	Waste generation and significant waste-related impacts	51					
	306-2	Management of significant waste-related impacts	51					
	306-3	Waste generated	56					YES
	306-4	Waste diverted from disposal	57-58					
Labor/Management Relations								
GRI 402: Labor/Management Relations 2016	402-1	Minimum notice periods regarding operational changes	143					
Diversity and Equal Opportunity								
GRI 405: Diversity and Equal Opportunity 2016	405-1	Diversity of governance bodies and employees	131, 132, 133, 140, 172, 173, 174					YES
	405-2	Ratio of basic salary and remuneration of women to men	142					YES
Non-discrimination								
GRI 406: Non-discrimination on 2016	406-1	Incidents of discrimination and corrective actions taken	141					YES
Initiatives towards environmental education taken by the bank								

Own disclosure	Own disclosure 7	Initiatives towards environmental education and awareness	93					
Social programmes by the Bank Millennium Group and the Bank Millennium Foundation								
Own disclosure	Own disclosure 8	Volunteer initiatives	164					
The banks sponsorship and charity initiatives								
Own disclosure	Own disclosure 9	Monetary donations and sponsorship	162					
Local Communities								
GRI 413: Local Communities 2016	413-1	Operations with local community engagement, impact assessments, and development programs	162					YES
Supplier Social Assessment								
GRI 414: Supplier Social Assessment 2016	414-1	New suppliers that were screened using social criteria	185					
Specific standard disclosures for the sector								
Product portfolio	FS5	Interactions with clients/ investees/ business partners regarding environmental and social risks and opportunities	185, 186, 187					
Local communities	FS13	Access points in low-populated or economically disadvantaged areas by type	107					YES
Local communities	FS14	Initiatives to improve access to financial services for disadvantaged people	104, 107					YES
Product and service labelling	FS15	Policies for the fair design and sale of financial products and services	124					YES
Product and service labelling	FS16	Initiatives to enhance financial literacy by type of beneficiary	116, 163					

6.4. CONTACT DATA

[GRI 2-3] Thank you for reviewing the ESG Report of Bank Millennium and the Bank Millennium Group for 2023. Please send your comments and questions about it to:

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SIGNED BY:

Date	First and last name	Position/Function	Signature
28.02.2024	Joao Bras Jorge	Chairman of the Management Board	Signed with a qualified electronic signature
28.02.2024	Fernando Bicho	Vice-Chairman of the Management Board	Signed with a qualified electronic signature
28.02.2024	Wojciech Haase	Management Board Member	Signed with a qualified electronic signature
28.02.2024	Andrzej Gliński	Management Board Member	Signed with a qualified electronic signature
28.02.2024	Wojciech Rybak	Management Board Member	Signed with a qualified electronic signature
28.02.2024	António Ferreira Pinto Júnior	Management Board Member	Signed with a qualified electronic signature
28.02.2024	Jarosław Hermann	Management Board Member	Signed with a qualified electronic signature