

## Environmental Policy

### Introduction

Bank Millennium S.A. Group (hereinafter: "Bank Millennium Group", "Group"), is committed to the protection of the environment and natural resources as well as mitigation and adaptation to climate change. That is why the Bank Millennium Group has developed this *Policy*. It complements the *Code of Ethics of the Bank Millennium Group* ("Code of Ethics"), business strategies, including strategic goals in the area of sustainability, and policies, in which the Group undertakes to be responsible for environment protection, management and monitoring of the direct and indirect negative impact of its activities, products and services.

The Bank Millennium Group incorporates and promotes a culture of responsible consumption and investment, and aims to maintain consistent actions to reduce its environmental and ecological footprint and to improve and develop sustainable financial practices.

### Goal

Aware of the direct and indirect impact of its operations upon the environment, the Bank Millennium Group specifies the main priorities aimed at minimising the total environmental footprint of Bank Millennium S.A. ("Bank Millennium", "Bank"), namely:

- Eco-efficiency of the Group's environmental actions.
- Environmentally driven financial products and responsible financing.
- Environmental education.

### Basic rules

#### Eco-efficiency of the Group's environmental actions

The Bank Millennium Group minimises its environmental impact by applying management principles and monitoring of greenhouse gases (GHG) emissions, water, electricity, fuel and material consumption, waste production and the definition of concrete and measurable goals related to these matters. In addition, it invests in the introduction of green solutions in its operations and encourages its employees, Clients and business partners to join environmental education activities.

#### Environmentally driven products and responsible investing

By combining the financing of environmentally friendly and energy-efficient projects, and creating an exclusion and conditioned list of sectors of activity not financed by the Bank Millennium, we aim to reduce the total carbon footprint of our lending activities, as defined in the line with the Bank Millennium Group's *Responsible Financing Policy* and *Principles for Responsible Investment*.

Also, new financing in the energy sector should prioritize:

- involvement in non-carbon and/or low-emission energy sources,
- energy transition to non-carbon sources.

For many years, the Bank Millennium Group has been supporting the financing of environmentally friendly and energy-efficient projects, including those related to:

- replacement of the coal energy by low-emission sources of energy and modern energy infrastructure,
- renewable energy sources,

- pollutant emission reduction and energy efficiency, especially in energy-intensive and high-emission industries,
- purchase or production of low-emission vehicles,
- sustainable buildings,
- waste, water and wastewater infrastructure.

### **Environmental education**

The Bank Millennium Group supports a culture of environmental responsibility and of action against climate changes. Promotes awareness and knowledge sharing among its employees, Clients, suppliers, and other stakeholders, and seeks to listen to them regarding their perceptions, needs and expectations on environmental issues. In justified cases, additional environmental clauses are used in contracts with product, goods, or service suppliers.

### **Benchmarks, standards and partnerships**

The Bank Millennium Group aligns its environmental responsibility activities with the best practices and guidelines established by several global standards and external initiatives, such as:

- UN Sustainable Development Goals,
- United Nations Global Compact,
- Paris Agreement on climate change.

Also, the Bank Millennium participates, as an associate or a member of associations, in working groups and/or discussions on sustainability issues, actively participating in the pursuit of environmental protection and sustainable investment practices.

### **Communication and reporting**

This *Policy* has been made available to the Group's employees on the internal intranet website, and to Clients and other external entities on the Bank Millennium website.

The Bank Millennium Group regularly monitors and communicates its environmental impact in its annual reporting, on the Bank's website dedicated to sustainability and through participation in various investor surveys and indices describing the results achieved and actions implemented. We are also rated by analysts preparing the world's leading ESG ratings i.e. MSCI, or Sustainalytics.

The Bank Millennium Group's disclosures are prepared in accordance with the best sustainability reporting standards, including:

- Corporate Sustainability Reporting Directive (CSRD),
- European Sustainability Reporting Standards (ESRS),
- EU Taxonomy.

The metrics for monitoring the Bank Millennium Group's performance under this *Policy* is prepared and established every two years by the Sustainability Committee.

### **Responsibility and supervision**

Responsibility for the implementation of the obligations under this *Policy* is assigned in accordance with the scope of responsibility of individual organisational units and their managers. The Bank's position is that environmental issues concern many sectors and areas of the Bank's operations, constituting an integral part of the business. The Sustainability Department, subject to the direct supervision of the Chairman of the Bank's Management Board, is responsible for supervising the process of implementing

the principles resulting from this *Policy* in the Bank Millennium Group. The activities resulting from the implementation of the assumptions of this policy are reported at the meetings of the Sustainability Committee, which consists of all members of the Bank's Management Board.

**The scope**

This document has been approved by the Management Board of Bank Millennium and applies to all companies of the Bank Millennium Group.