



9M 2025 REPORT & ACCOUNTS

Pursuant to CMVM Regulation 1/2023, please find herein the transcription of the

9M 2025 Report and Accounts

BANCO COMERCIAL PORTUGUÊS, S.A.

Public limited company

Registered Office: Praça D. João I, 28, 4000-295 Porto - Share Capital EUR 3,000,000,000.00

Registered at Porto Commercial Registry, under the single registration and tax identification number 501 525 882

The 9M 2025 Report and Accounts is a translation of the “Relatório e Contas dos primeiros nove meses de 2025” document delivered by Banco Comercial Português, S.A. to the Portuguese Securities and Market Commission (CMVM), in accordance with Portuguese law.

The sole purpose of the English version is to facilitate consultation of the document by English-speaking Shareholders, Investors and other Stakeholders, and, in case of any doubt or contradiction between the documents, the Portuguese version of the “Relatório e Contas dos primeiros nove meses de 2025” prevails.

All references in this document to the application of any regulations and rules refer to the respective version currently in force.

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Miguel Maya
Chief Executive Officer
Vice-Chairman of the Board
of Directors

Nuno Amado
Chairman of the Board
of Directors



From left to right:
Maria José Campos (Member of the Executive Committee); **Rui Teixeira** (Member of the Executive Committee);
Miguel Bragança (Vice-Chairman of the Executive Committee); **Miguel Maya** (Chairman of the Executive Committee);
João Nuno Palma (Vice-Chairman of the Executive Committee); **José Miguel Pessanha** (Member of the Executive Commr

Main highlights of the Results in 9M 2025

A Solid and Efficient Bank

Profitability

- In the first nine months of 2025, the Group's net income amounted to EUR 775.9 million, reflecting an increase of 8.7% compared to the same period of the previous year. This performance resulted in a ROE of 14.6% in September 2025.
- Net income in the activity in Portugal increased by 8.0% from EUR 606.0 million in the first nine months of 2024, to EUR 654.5 million in the first nine months of 2025.
- International operations recorded a positive performance, with net income increasing 19.8%, from EUR 192.7¹ million in the first nine months of 2024 to EUR 230.7¹ million in the first nine months of 2025. Highlight to Bank Millennium's net income of EUR 202.0¹ million in the first nine months of 2025, despite charges of EUR 380.2² million related with CHF mortgage loan portfolio (of which EUR 310.4² million in provisions).

Business Model

- Solid capital ratios, CET1³ ratio stood at 15.9% and total capital ratio³ at 19.9%.
- Liquidity indicators⁴ well above regulatory requirements: LCR at 321%, NSFR at 180% and LtD at 68%. Eligible assets available to discount at ECB of EUR 29.1 billion.
- Group's total Customer funds grew 8.6% to EUR 109.5 billion and Loans to customers increase 4.9% to EUR 61.5 billion compared to September 2024. In Portugal, customer loans increased by 7.2% (EUR +2.9 billion) and total customer funds increase by 6.3% (EUR +4.4 billion) compared to September 2024.
- Relevant reduction in non-performing assets compared to September 2024: reduction of EUR 334 million in NPE, EUR 71 million in corporate restructuring funds and EUR 19 million in foreclosed assets.
- Cost of risk of the Group stood at 31 bp in the first nine months of 2025, which compares with 38 bp⁵ in the same period of the previous year. In Portugal, cost of risk stood at 33 bp in line with the same period of the previous year⁵.
- Customer base surpasses 7.2 million, highlighting the 9% increase in mobile Customers, which represented 74% of total active Customers at the end of September 2025.

1 Before non-controlling interests. 2 Includes provisions for legal risk, costs with out-of-court settlements and legal advice. Does not include provisions for legal risk on CHF mortgages of Euro Bank (guaranteed by a third party). Before taxes and non-controlling interests. 3 Fully implemented estimated ratio (September 2025) including 25% of the unaudited net income of 9M'25. 4 Liquidity Coverage Ratio (LCR); Net Stable Funding Ratio (NSFR); Loans to Deposits Ratio (LtD). 5 Includes an impairment reversal that occurred in Q2'24. Without this effect cost of risk stood at 49bp in the Group and in the activity in Portugal in 9M'24.

Main highlights ⁽¹⁾

million EUR

	30 Sep. 25	30 Sep. 24 (restated ²)	Chg. 25/24
BALANCE SHEET			
Total assets	108,937	100,226	8.7 %
Equity	8,702	8,038	8.3 %
Loans to customers (net)	60,109	57,094	5.3 %
Total customer funds	109,526	100,817	8.6 %
Balance sheet customer funds	89,823	83,525	7.5 %
Deposits and other resources from customers	88,355	82,239	7.4 %
Loans to customers (net) / Deposits and other resources from customers (3)	68 %	69 %	
Loans to customers (net) / Balance sheet customer funds	67 %	68 %	
RESULTS			
Net interest income	2,167	2,111	2.6 %
Net operating revenues	2,825	2,691	5.0 %
Operating costs	1,033	946	9.2 %
Operating costs excluding specific items (4)	1,029	943	9.2 %
Results on modification	(5)	(62)	91.4 %
Loan impairment charges (net of recoveries)	141	167	(15.7 %)
Other impairment and provisions	444	460	(3.4 %)
Income tax	317	263	20.7 %
Net income	776	714	8.7 %
PROFITABILITY AND EFFICIENCY			
Net operating revenues / Average net assets (3)	3.6 %	3.7 %	
Return on average assets (ROA)	1.1 %	1.1 %	
Income before tax and non-controlling interests / Average net assets (3)	1.5 %	1.4 %	
Return on equity (ROE)	14.6 %	14.9 %	
Return on tangible equity (ROTE)	15.2 %	15.4 %	
Income before tax and non-controlling interests / Average equity (3)	19.9 %	19.5 %	
Net interest margin	2.92 %	3.05 %	
Cost-to-core income (4)	36.8 %	34.7 %	
Cost-to-income (3)	36.6 %	35.1 %	
Cost-to-income (3)(4)	36.4 %	35.0 %	
Cost-to-income - Activity in Portugal (3)(4)	34.3 %	32.4 %	
Staff costs / Net operating revenues (3)(4)	20.3 %	19.3 %	
CREDIT QUALITY			
Cost of risk (net of recoveries, in b.p.) (5)	31	38	
Non-Performing Exposures (loans to customers) / Loans to customers	2.6 %	3.3 %	
Total impairment (balance sheet) / NPE (loans to customers)	86.8 %	80.0 %	
Restructured loans / Loans to customers	2.0 %	2.7 %	
LIQUIDITY			
Liquidity Coverage Ratio (LCR)	321 %	314 %	
Net Stable Funding Ratio (NSFR)	180 %	175 %	
CAPITAL (6)			
Common equity tier I phased-in ratio	16.1 %	16.5 %	
Common equity tier I fully implemented ratio	15.9 %	16.5 %	
Total ratio fully implemented	19.9 %	20.8 %	
BRANCHES			
Activity in Portugal	394	397	(0.8 %)
International activity	787	805	(2.2 %)
EMPLOYEES			
Activity in Portugal	6,224	6,275	(0.8 %)
International activity (7)	9,631	9,441	2.0 %

(1) Some indicators are presented according to management criteria of the Group, which concepts are described and detailed at the Glossary and at alternative performance measures chapter.

(2) In the fourth quarter of 2024, a reclassification was made between "Financial assets at fair value through profit or loss" and "Investments in associates". The historical amounts of such items considered for the purposes of this analysis are presented considering these reclassifications with the purpose of ensuring their comparability, differing, therefore, from the disclosed accounting values (EUR 6 million in September 2024).

Following the change in off-balance sheet customer funds assessment criteria by the Polish subsidiary in the fourth quarter of 2024, the respective balances were restated, resulting in an increase of EUR 41 million with reference to the end of September 2024.

In the last quarter of 2024, the Polish subsidiary adjusted the previously disclosed amount of NPE as of September 2024, resulting in a reduction of EUR 1 million compared to the amount disclosed at that date.

In the first quarter of 2025, the Bank recognised as other net operating income the costs associated with property valuation related to mortgage loans, recognised as credit and guarantees commissions and as other administrative costs in previous periods. The historical amounts of such items considered for the purposes of this analysis have been reclassified with the purpose of ensuring their comparability, differing, therefore, from the disclosed accounting amounts. The impact of these reclassifications in the first nine months of 2024 was EUR -4 million in other net operating income, offset by net commissions (EUR +3 million) and other administrative costs (EUR -1 million).

Additionally, in the second quarter of 2025, some amounts booked in commissions were reclassified, in order to improve the quality of the information reported. The historical amounts of such items are presented considering these reclassifications with the purpose of ensuring their comparability, with the following impacts as at September 2024: EUR +1 million in cards and transfers, offset by EUR -1 million in management and maintenance of accounts and an immaterial amount, in the scope of this analysis, in other banking commissions. The overall amount of net commissions disclosed in previous periods remains unchanged compared to that published in previous periods.

In the second quarter of 2025, the Bank reclassified a portfolio of debt instruments associated to credit operations, previously included in the Securities Portfolio (Debt securities held not associated with credit operations), now recognising them as Loans to Customers (Debt securities held associated with credit operations). The historical amounts considered for the purposes of this analysis are presented according to this reclassification, aiming to ensure their comparability, thus differing from the disclosed accounting amounts (EUR 1,146 million before impairment in September 2024). In September 2024, balance sheet impairment associated with these operations amounted to EUR 3 million. Consequently, the impact net of impairment on Loans to Customers portfolio and on Securities Portfolio was EUR 1,143 million in September 2024. This accounting reclassification also led to the reclassification of the respective results, namely from other impairment and provisions to loan impairment (EUR 1 million in September 2024). The results arising from these operations, associated with both net interest income and net trading income, were also reclassified, although the total amount of each item presented in this analysis did not change compared to the amounts disclosed in previous periods.

All indicators associated with the aforementioned reclassifications have been restated accordingly.

(3) According to Instruction from the Banco de Portugal no. 16/2004, as the currently existing version.

(4) Excludes the impact of specific items: negative impact of EUR 3 million in both the first nine months of 2025 and the first nine months of 2024. In both periods, specific items were recognised in staff costs in the activity in Portugal including costs with employment terminations, namely early retirements and indemnifications. In the first nine months of 2025, specific items also include a reversal of costs with mortgage financing to former employees and in the same period of 2024, an income recognised after an agreement related to liabilities with former directors of the Bank.

(5) Includes the impact of certain impairments reversal occurred in the activity in Portugal in the second quarter of the previous year. Excluding this impact, the Group's cost of risk in the first nine months of 2024 was 49 basis points.

(6) The capital ratios as at 30 September 2025 include 25% of the unaudited net income of the first nine months of 2025.

(7) Of which, in Poland: 6,943 employees as at 30 September 2025 (corresponding to 6,824 FTE - full-time equivalent) and 6,819 employees as at 30 September 2024 (corresponding to 6,696 FTE - full-time equivalent).

Information on BCP Group

Brief description

Banco Comercial Português, S.A. (BCP, Millennium bcp or Bank) is the largest Portuguese private sector bank. The Bank, with its decision centre in Portugal, operates and acts with respect for people and institutions, focusing on the Customer, pursuing a mission of excellence, trust, ethics and responsibility, and is a distinguished leader in various financial business areas in the Portuguese market and a reference institution on an international level. The Bank also holds a prominent position in Africa through its banking operation in Mozambique (in Angola, Banco Millennium Angola - BMA merged with Banco Privado Atlântico-BPA and currently the Bank holds a equity accounted shareholding) and in Europe through its banking operation in Poland. Since 2010, the Bank operates in Macau through a full branch.

Bank History

BCP was incorporated on 17 June 1985 as a limited liability company ("sociedade anónima") organised under the Portuguese laws, following the deregulation of the Portuguese banking industry. BCP was founded by a group of over 200 shareholders and a team of experienced banking professionals who sought to capitalise on the opportunity to form an independent financial institution that would serve the then underdeveloped Portuguese financial market more effectively than state-owned banks.

While the Bank's development was initially characterised by organic growth, a series of strategic acquisitions helped solidify its position in the Portuguese market and increase its offering of financial products and services. In March 1995, BCP acquired control of Banco Português do Atlântico, S.A. ("Atlântico"), which was then the largest private sector bank in Portugal. This was followed by a joint takeover bid for the whole share capital of Atlântico. In June 2000, Atlântico was merged into BCP. In 2000, BCP also acquired Império, along with Banco Mello and Banco Pinto & Sotto Mayor.

In 2004, with a view to strengthening its focus on the core business of distribution of financial products and optimising capital consumption, BCP sold insurers Império Bonança, Seguro Directo, Impergesto and Servicomercial to the Caixa Geral de Depósitos group. BCP also entered into agreements with Fortis (now named Ageas) for the sale of a controlling stake and management control of insurers Ocidental - Companhia Portuguesa de Seguros, S.A., Ocidental - Companhia Portuguesa de Seguros de Vida, S.A. and Médis - Companhia Portuguesa de Seguros de Saúde, S.A., as well as the pension

fund manager PensõesGere - Sociedade Gestora de Fundos de Pensões, S.A.

In 2004, the Bank sold its non-life insurance businesses and divested a portion of its life insurance business by entering into a joint venture with Ageas (formerly Fortis), named Millenniumbcp Ageas, of which 51% is held by Ageas and 49% by the Bank.

After the consolidation of its position in the Portuguese banking market, the Bank focused on the development of its retail business in new regions, with the goal of attaining significant positions in emerging markets in Europe and in Africa. The Bank concentrated on businesses with strong growth prospects in foreign markets with a close historical connection to Portugal or that have large communities of Portuguese origin (such as Angola, Mozambique, the United States, Canada, France, Luxembourg and Macao), as well as in markets where the Bank's successful Portuguese business model could be effectively exported to and tailored to suit such local markets (such as Poland, Greece and Romania).

The Bank has pursued a consistent strategy of market segmentation. Until 2003, these segments were served through autonomous distribution networks operating under a variety of brand names. In October 2003, BCP began the process of replacing these brands in Portugal with a single brand name: Millennium bcp. The rebranding in other markets was completed in 2006. All banking operations controlled by BCP are now carried out under the "Millennium" brand. In Portugal, the Bank also operates under the "ActivoBank" brand.

In recent years, the Bank has refocused on operations that it considers core to its business. As part of this refocus, the Bank divested several of its international operations (in France, where it keeps a partnership with a shareholding below 20%, Luxembourg, United States, Canada, Greece, Turkey and Romania), while retaining commercial protocols to facilitate remittances from Portuguese emigrants in some markets. In 2010, the Bank transformed its Macao off-shore branch into an on-shore branch.

In February 2012, the Bank adopted a management restructuring through the introduction of a one-tier management and supervisory model, in which the Board of Directors includes an Executive Committee and an Audit Committee (the latter comprising non-executive members, and with a majority of independent members, in accordance with the applicable law).

In December 2012, the Bank prepared and presented to the Portuguese government a Restructuring Plan, required by national law and by the applicable European rules on matters of State aid. The Restructuring Plan was formally

submitted by the Portuguese government to the EC and, In July 2013, the Bank agreed on the plan with the EC, entailing an improvement of the profitability of the Bank in Portugal through continued cost reduction, among other drivers. On September 2013, the DG Comp announced its formal decision in connection with its agreement with the Portuguese authorities concerning the Bank's Restructuring Plan. Pursuant to the decision, the Bank's Restructuring Plan was found in compliance with the European Union's rules relating to State aid, demonstrating the Bank's viability without continued State support. The implemented Restructuring Plan aimed at strengthening the Bank's strategy by focusing on its core activities.

In May 2014, as part of a process to refocus on core activities defined as a priority in its Strategic Plan, the Bank announced that it agreed with the international insurance group Ageas a partial recast of the strategic partnership agreements entered into in 2004, which included the sale of its 49% interest in the (currently jointly owned) insurance companies that operate exclusively in the non-life insurance business, i.e. Ocidental – Companhia Portuguesa de Seguros, S.A. and Médis – Companhia Portuguesa de Seguros de Saúde, S.A..

In April 2016, the Bank announced the conclusion of the merger between Banco Millennium Angola, S.A. with Banco Privado Atlântico, S.A., resulting in the second-largest private sector bank in Angola in terms of loans to the economy, with a market share of approximately 10% in business volume. The entity resulting from this merger ceased to be controlled by BCP.

In January 2017, BCP announced a EUR 1.3bn rights issue with transferable pre-emptive subscription rights. The aim of this transaction was to bring forward the full repayment of remaining Government Subscribed Securities and the removal of key State-aid related restrictions, including the dividend ban, the risk of potential sale of core businesses and the tail risk of conversion. This transaction was designed to strengthening the balance sheet through the improvement of the CET1 FL ratio and Texas ratio, bringing them in line with new industry benchmarks and above regulatory requirements.

On December 27, 2019, the merger deed of Banco de Investimento Imobiliário, S.A., a wholly-owned subsidiary of Banco Comercial Português, S.A., by incorporation into the latter, was signed, thus completing the incorporation process of Banco de Investimento Imobiliário, S.A. into Banco Comercial Português, S.A..

On 27 August 2019, the Extraordinary General Meeting of Bank Millennium S.A., in which 216 shareholders representing 78.53% of its share capital, participated, approved the merger of Bank Millennium S.A. with Euro Bank S.A.. The completion of the integration of Eurobank S.A. into Bank Millennium S.A. took place in November, with the Bank resulting from the

merger now operating under a single brand, a single operating system and a single legal entity.

On June 29, 2021 BCP entered into an agreement with Union Bancaire Privée, UBP SA regarding the sale of the entire share capital of Banque Privée BCP (Suisse) SA ("Banque Privée"). The sale of the entire share capital of Banque Privée BCP (Suisse) SA ("Banque Privée") to Union Bancaire Privée, UBP SA was completed on November 2, 2021. The sale of Banque Privée allows BCP Group to pursue its strategy of focusing resources and management on core geographies, enhancing their development and thus creating value for stakeholders.

On 29 December 2021, BIM – Banco Internacional de Moçambique, SA (a bank incorporated under Mozambican law in which BCP indirectly holds a stake of 66.69%) formalized the entry into force of a long-term agreement with Fidelidade – Companhia de Seguros, SA, with a view to strengthening capabilities and expanding the offer of insurance through the banking channel (bancassurance) in Mozambique. Under this partnership, the possibility of which was provided for in the memorandum of understanding signed between BCP and the Fosun Group in November 2016, BIM and Fidelidade also formalized the sale by BIM to Fidelidade of shares representing 70% of the share capital and voting rights of Seguradora Internacional de Moçambique, SA, with BIM maintaining approximately 22% of its share capital. BIM and Fidelidade also agreed call and put options with a view to enabling Fidelidade to acquire additional shares, and BIM's shareholding, as a result of these options, may be reduced to 9.9% of SIM's capital. Under the long-term exclusive distribution agreement, BIM will promote the distribution of SIM insurance through the banking channel, continuing to provide its customers with a wide range of competitive insurance products, which is reinforced by the partnership with Fidelidade, an Insurance Group of reference.

In the 1st half of 2023, Bank Millennium concluded the sale of 80% of Millennium Financial Services, as part of the strategic partnership in the bancassurance area.

In the 1st half of 2024, Bank Millennium S.A. informed that it took a decision to complete the implementation of the Recovery Plan, notifying of the fact Polish Financial Supervision Authority and Bank Guarantee Fund.

In the 3rd quarter of 2024 Earnings Presentation, BCP and Bank Millennium presented their strategic plans for 2025-28.

Governance

Banco Comercial Português, S.A. has a one-tier management and supervision model, composed of a Board of Directors (BD), which includes an Executive Committee (EC) and an Audit Committee composed of only non-executive directors and with a majority of independents. The Company also has a Remuneration and Welfare Board (RWB) and a Strategic Board.

In addition, the Group uses a Statutory Auditor and an external auditing firm to audit the individual and consolidated accounts of the Bank, elected at the General Meeting.

The BD is the governing body of the Bank with the broad powers of management and representation, pursuant to the law and the articles of association.

Under the terms of the Bank's articles of association, the BD is made up of a minimum of 15 and a maximum of 19 members with and without executive functions, elected by the General Meeting of Shareholders for a period of four years, with re-election permitted. As of June 30, 2025, the Board of Directors was made up of 17 members, of which 14 were elected at the General Meeting of Shareholders held on May 4, 2022. The remaining members were co-opted by the Board of Directors, 2 on 11 October 2022, with the co-option being ratified at the General Meeting held on 20 December 2022, and the last on 22 January 2025, ratified at the General Meeting held on 22 May 2025. All co-options were deliberated following the obtaining of authorisation to exercise their functions by the European Central Bank (ECB).

Of the 17 members that make up the BD, 6 are executive and 11 are non-executive, with 6 qualified as independent.

The BD began its functions on September 5, 2022 and was responsible for appointing the EC, made up of six of its members, with its President being appointed by the General Assembly. The BD delegated the day-to-day management of the Bank to the EC, with it being responsible for ensuring all management functions that the BD did not reserve for itself. The EC is assisted by several committees and subcommittees, which are responsible for special monitoring of some relevant matters.

Banco Comercial Português, S.A. is in the process of identifying and selecting a new non-executive member to join the Board of Directors.

The supervision of the company is ensured by an Audit Committee (AudC), elected by the General

Meeting of Shareholders, and composed of a minimum of 3 and a maximum of 5 members, elected together with the other administrators, and the lists proposed for the BD must detail the members who are intended to form part of the Audit Committee and indicate the respective President. AudC is made up of 3 non-executive directors, the majority of whom are independent members as well as its president and also includes an alternate member.

The RWB's mission is to observe the long-term interests of shareholders, investors and other interested parties, as well as the public interest in general. It is made up of three to five members, all independent of the EC members.

The Strategic Board is a non-permanent consultative body and its inherent members are the President and Vice-Presidents of the BD, as well as the President of the EC.

The Board of Directors also has other committees to which it delegates some powers, in addition to the Executive Committee and the Audit Committee, which have their own and delegated powers, namely the Risk Assessment Committee (CAvR), the Nominations and Remuneration Committee (CNR) and the Corporate Governance, Ethics and Sustainability Committee (CGSES).

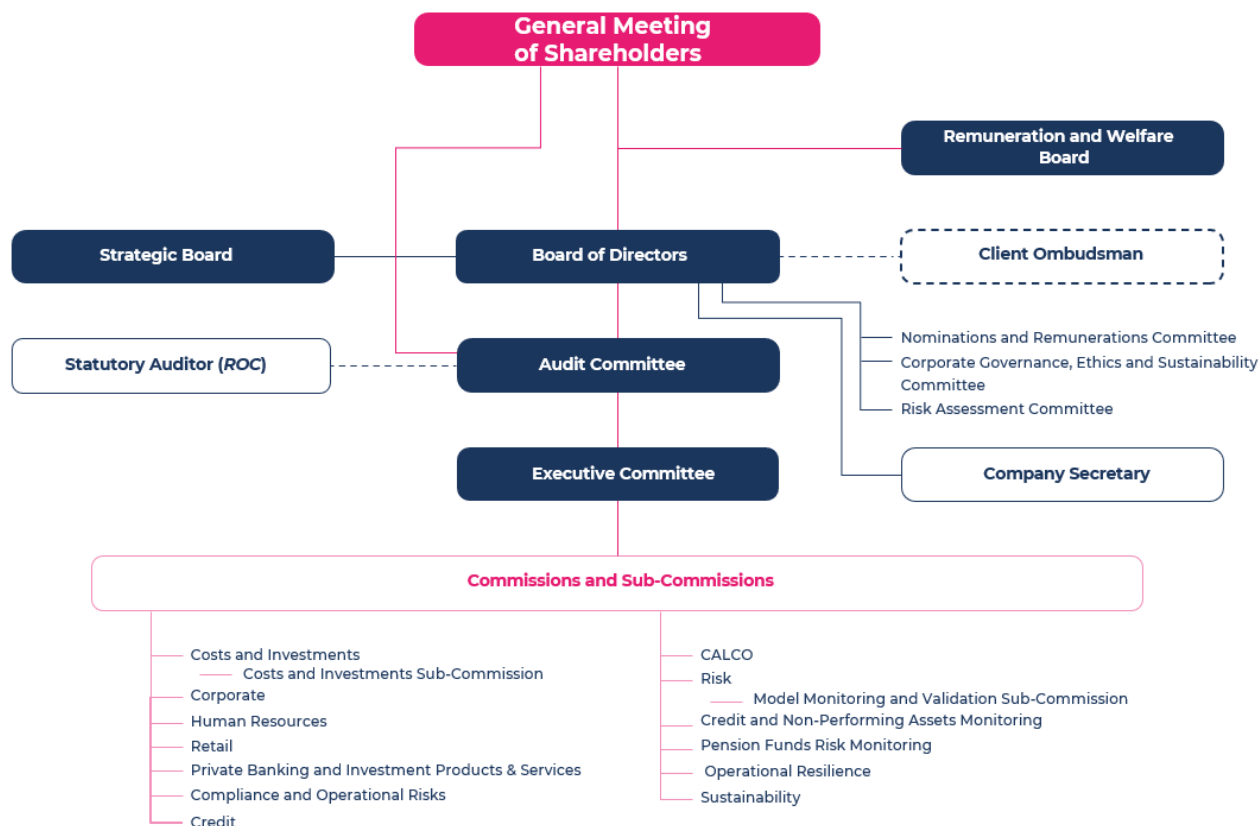
The CAvR advises and supports the Board of Directors on the Bank's strategy and risk appetite, monitoring its implementation, in accordance with the law and its Rules of Procedure.

The CNR has powers to assess the suitability requirements of the members of the Board of Directors, its Committees and holders of essential functions, to define the Succession and Remuneration policies for Directors and Employees, monitoring their implementation, as well as other matters relating to the Bank's human resources, in accordance with the law and its Rules of Procedure.

CGSES is responsible for monitoring corporate governance policies and processes, conduct, values and social responsibility, overseeing the Bank's sustainability initiatives, monitoring the PDS (Corporate Social Responsibility Plan) and the Data Protection program, as well as issuing opinions on the annual governance and sustainability reports.

The Company Secretary and the Alternate Secretary are appointed by the Bank's BD, and their term-of-office matches that of the BD that appointed them.

Corporate Governance Model



Identification and composition of the Corporate Bodies and Committees from the Board of Directors

The Board of Directors and its Committees currently have the following composition:

	Board of Directors (BD)	Executive Committee (EC)	Audit Committee (AudC)	Committee for Corporate Governance, Ethics and Sustainability (CCGES)	Committee for Nominations and Remunerations (CNR)	Risk Assessment Committee (RAC)
Nuno Manuel da Silva Amado (Chairman of BD and of CGSES)	●			●		
Jorge Manuel Baptista Magalhães Correia (Vice-Chairman of BD and Member of RWB)	●					
Valter Rui Dias de Barros (Vice-Chairman of BD)	●		●		●	
Miguel Maya Dias Pinheiro (Vice-Chairman of BD)	●	●				
Ana Paula Alcobia Gray	●					●
Cidália Maria da Mota Lopes (Chairman of AudC)	●		●			
Fernando da Costa Lima (Chairman of RAC)	●		●			●
João Nuno de Oliveira Jorge Palma	●	●				
Lingzi Yuan (Smilla Yuan) (Chairman of CNR)	●				●	
José Miguel Bensliman Schorcht da Silva Pessanha	●	●				
Lingjiang Xu	●			●	●	
Maria José Henriques Barreto de Matos de Campos	●	●				
Miguel de Campos Pereira de Bragança	●	●				
Rui Manuel da Silva Teixeira	●	●				
Esmeralda da Silva Santos Dourado	●					
Altina de Fátima Sebastian Gonzalez *	●					●
José Pedro Rivera Ferreira Malaquias	●			●		

* Alternate member of the Audit Committee.

The Remuneration and Welfare Board is chaired by José António Figueiredo Almaça and composed of the two vice-chairmen Jorge Magalhães Correia e Valter Barros.

The Strategic Council, as an advisory and non-permanent body, has a variable composition, with the Chairman and Vice-Chairmen of the Board of Directors being inherent members.

The Board of the General Meeting elected for the term of office 2024/2027 in the General meeting of Shareholders held on 22 May 2024, has the following composition:

Chairman: Pedro Rebelo de Sousa

Vice-chairman: Octávio Castelo Paulo

Secretary of the Board: Company Secretary (Ana Moniz Macedo)

Main events in 9M 2025

In the first nine months of 2025, in a context of worsening risks associated with the international geopolitical situation, BCP stood out for its role in supporting companies and families, for its policy of proximity, trust and for the quality of the services provided to its Customers.

On 22 January 2025, the Bank informed that its Board of Directors, in accordance with the law and the Bank's regulations on Succession Planning, approved on that date the co-optation of Esmeralda da Silva Santos Dourado as independent non-executive director of the Bank, thus filling the vacancy on the Board of Directors for the four-year period 2022-2025. The co-optation was resolved following obtaining authorization from the European Central Bank to exercise her functions and submitted for ratification at the Bank's General Meeting.

On 10 March 2025, the Bank informed about decision to early redeem in full the EUR 450 million Subordinated Fixed Rate Reset Notes due 27 March 2030 bond issue.

On 12 March 2025, the Bank informed that S&P Global upgraded BCP's senior unsecured debt ratings from BBB to BBB+, changing the Outlook to Stable.

On 13 March 2025, the Bank informed about the decision to launch a tender offer on a T2 Notes issue due December 2027. The Offer was conditional on the successful completion of the issuance of a new series of Subordinated Fixed Rate Reset Notes issued off the Banks' Euro Note Programme, subject to market conditions in amount of at least EUR 450 million.

On 13 March 2025, the Bank informed that has fixed the terms for a new issue of subordinated Tier 2 Notes under its Euro Note Programme. The issue, in the amount of EUR 500 million, will have a tenor of 12 years, with the option of early redemption by the Bank in the last three months of year 7, an annual interest rate of 4.75% during the first 7 years (corresponding to a spread of 2.150% (the "Spread") over the 7-year mid-swap rate). The interest rate for the last 5 years will be determined on the basis of the then applicable 5-year mid-swap rate plus the Spread. The issue was placed among a diversified base of institutional investors after a speedy and successful execution.

On 21 March, 2025, the Bank informed that the results of the offer to holders of the outstanding EUR 166.3 million of the issue of EUR 300 million 4.50% T2 Subordinated Fixed Rate Reset Notes due December 2027 (ISIN: PTBCPWOM0034). were determined on 20 March, 2025, and that it received valid offers to sell from the holders of Notes in a total nominal amount of EUR 79.5 million, all of which it has accepted to purchase.

On 1 April 2025, the Bank informed that, from that day,, ceased the assignment of rating by Morningstar DBRS to the Covered Bonds issued by BCP. BCP's covered bonds maintain the ratings currently assigned by Moody's and Fitch Ratings, respectively, of 'Aaa' and 'AAA'.

On 8 April 2025, the Bank informed that a share buyback programme in the total amount of EUR 200 million, equivalent to approximately 2.683%¹ of BCP's market capitalization[1] was approved that day. The objective of the Buy-Back Programme, for the purposes of Article 5(2)(a) of Regulation (EU) No. 596/2014, is the cancellation of treasury shares acquired under its scope and it will be implemented in accordance with the provisions of Regulation (EU) No. 596/2014, as supplemented by Delegated Regulation (EU) No. 2016/1052, taking into consideration the terms and conditions described, and also being conditional to: (i) the limits set out in the resolution adopted under item 6 of the Agenda of the General Meeting held on 22 May 2024, as duly disclosed to the market; (ii) the terms and conditions of any future authorisations for the acquisition of treasury shares that may be approved by the General Meeting of Shareholders of BCP; and (iii) the terms and conditions of any share capital reduction that may be resolved for these purposes by the General Meeting of Shareholders.

On 14 April 2025, the Bank started the Share Buy-Back Programme approved by the Bank in accordance with the terms and conditions described in the announcement regarding the start of trading under the Buy-Back Programme disclosed by BCP on 8 April .

On 21 May 2025, the Bank informed that Moody's has upgraded the Baseline Credit Assessment (BCA) and Adjusted BCA from 'baa3' to 'baa2'. As a result, Moody's upgraded the rating of the deposits from 'A3' to 'A2', the rating of the subordinated debt from 'Ba1' to 'Baa3', standing after the revision at an Investment Grade level and affirmed the rating of the senior unsecured debt at 'Baa1'. The Outlook on the deposit rating was changed to stable, while the Outlook on senior unsecured debt is stable.

¹ With reference to the closing price registered in the regulated market Euronext Lisbon on 8 April 2025.

On 22 May 2025, the Bank concluded, at the Bank's facilities and, simultaneously, through electronic means with 66.19% of the share capital represented, the Annual General Meeting of Shareholders, with the following resolutions:

Item One – Approval of the management report, the balance sheet and the individual and consolidated accounts for the financial year 2024, the Corporate Governance Report, which includes a chapter on the remuneration of the management and supervisory bodies, and the Sustainability Report;

Item Two – Approval of the proposal for the appropriation of profits regarding the 2024 financial year;

Item Three – Approval of a vote of trust and praise addressed to the Board of Directors, including to the Executive Committee and to the Audit Committee and each one of their members, as well as to the Chartered Accountant and its representative;

Item Four – Ratification of the co-option of a director for the 2022-2025 term of office;

Item Five – Approval of the Shareholder Distribution Policy;

Item Six – Approval of the updating the Remuneration Policy for Members of the Management and Supervisory Bodies;

Item Seven – Approval of the updating the Internal Policy for the Selection and Assessment of the suitability of members of the management and supervisory bodies and key function holders;

Item Eight – Approval of the reduction of the Bank's share capital by up to €150,000,000.00 (one hundred and fifty million euros), with the special purpose of implementing a Buyback Programme and cancelling own shares already acquired or to be acquired under said programme, involving the cancellation of up to 755,699,497 own shares representing up to 5% of the total number of shares representing the share capital, as well as the related reserves, with the consequent amendment of article 4(1) of the articles of association;

Item Nine – Approval of the increase of the Bank's share capital to €3,000,000,000, by incorporating the special reserve that may be set up under item Eight of the Agenda, by the amount corresponding to the resulting share capital reduction and without issuing new shares, with the consequent amendment of Article 4(1) of the articles of association;

Item Ten – Approval of the amendment to article 27(2) of the Articles of Association (postal and electronic voting);

Item Eleven – Approval of the acquisition and sale of own shares and bonds.

On 16 June 2025, the Bank informed that it has set the terms for a new issue of senior preferred debt securities eligible for MREL (Minimum Requirement for own funds and Eligible Liabilities), under its Euro Note Programme. The issue, in the amount of EUR 500 million, has a tenor of 6 years, with the option of early redemption by the Bank at the end of year 5, an issue price of 99.631% and an annual interest rate of 3.125% during the first 5 years (corresponding to a spread of 0.95% over the 5-year mid-swap rate). The interest rate for the year 6 was set at 3-month Euribor plus a 0.95% spread. The issue was placed among a very diversified base of institutional investors, namely in investment funds, banks and pension funds.

On 11 July 2025, the Bank informed that it has been notified by Banco de Portugal, as the national resolution authority, about the update of its minimum requirement for own funds and eligible liabilities ("MREL" or "Minimum Requirement for own funds and Eligible Liabilities") as decided by the Single Resolution Board.

The resolution strategy applied continues to be that of a multiple point of entry ("MPE"). The MREL requirements to be met by BCP Group of Resolution (consisting of BCP, S.A., Banco ActivoBank, S.A. and all the subsidiary companies of BCP apart from Bank Millennium S.A. and Banco Internacional de Moçambique and their respective subsidiaries), with immediate application, is of:

- 24.89% of the total risk exposure amount ("TREA") to which adds further a combined buffer requirement ("CBR"), which also includes the "Countercyclical Capital Buffer" — CCyB and the "Systemic Risk Buffer" — SyRB, currently of 3.95%, thus corresponding to total requirements currently of 28.84%; and
- 6.86% of the leverage ratio exposure measure ("LRE").

Additionally, the Bank informed that is not subject to any subordination requirements.

In accordance with the regulations in force, MREL requirements could be annually updated by the competent authorities, and therefore these targets replace those previously set.

On that date, BCP informs that it complies with the established MREL requirements, both as a percentage of the TREA (including the CBR) and as a percentage of the LRE.

On 1 August 2025, in the context of the Buy-Back Programme, the Bank informed that has, up until that date, purchased 266.116.418 shares for a price amounting to a total of EUR 166,949,656.41 (execution rate of 83%), holding on that date an aggregate total 266.116.418 own shares, representing 1.76% of its share capital.

On 1 August 2025, the Bank informed that was subject to the 2025 EU-wide stress test conducted by the European Banking Authority (EBA), in cooperation with the Banco de Portugal (BdP), the European Central Bank (ECB), and the European Systemic Risk Board (ESRB).

Banco Comercial Português, S.A. notes the announcements made on that date by the EBA on the EU-wide stress test and fully acknowledges the outcomes of this exercise, comprising 64 banks that together represent around 75% of total banking assets in the European Union.

The 2025 EU-wide stress test does not contain a pass-fail threshold and instead is designed to be used as an important source of information for the purposes of the Supervisory Review and Evaluation Process (SREP). The results will assist competent authorities in assessing Banco Comercial Português, S.A. ability to meet applicable prudential requirements under stressed scenarios.

The adverse stress test scenario was set by the ECB/ESRB and covers a three-year time horizon (2025-2027). The stress test has been carried out applying a static balance sheet assumption as of December 2024, and therefore does not take into account future business strategies and management actions. It is not a forecast of Banco Comercial Português, S.A. financial evolution.

Considering the results of Banco Comercial Português, S.A. in the stress test, it should be highlighted the following:

- the application of the adverse scenario resulted in a reduction of 228 b.p. at the end of 2025, 152 b.p. at the end of 2026 and of 100 b.p. at the end of 2027 compared to the CET1 fully loaded restated (CRR3) capital ratio of 2024, which compares with an average reduction in the universe of the 64 banks submitted to this exercise, of 260 b.p. at the end of 2025, 275 b.p. at the end of 2026 and 304 b.p. at the end of 2027.
- the application of the baseline scenario resulted in an increase of 129 b.p. in the fully loaded CET1 capital ratio at the end of 2025, 254 b.p. at the end of 2026 and of 279 b.p. at the end of 2027 compared to the CET1 fully loaded restated (CRR3) capital ratio of 2024, which compares with an average increase in the universe of the 64 banks submitted to this exercise, of 65 b.p. at the end of 2025, 113 b.p. at the end of 2026 and 128 b.p. at the end of 2027.

On 19 September 2025, the Bank informed that it has decided to exercise its option to early redeem all of its EUR500,000,000 Senior Preferred Fixed to Floating Rate Notes due October 2026 (ISIN: PTBCP2OM0058), issued on 2 October 2023 under the EUR25,000,000,000 Euro Note Programme (the "Notes"), in accordance with condition 6(d) of the terms and conditions of the Notes and the final terms of the Notes. The early redemption of the Notes took place on the optional redemption date set out in the final terms of the Notes, 2 October 2025, at their outstanding principal amount together with accrued interest.

SUBSEQUENT EVENTS

On 1 October 2025, the Bank informed that Morningstar DBRS rating agency upgraded the Bank's deposits ratings from A(low) to A and the senior unsecured debt ratings from BBB(high) to A(low).

On 3 November 2025, the Bank informed that, under the context of the Supervisory Review and Evaluation Process (SREP), it has been notified of the decision of the European Central Bank (ECB) regarding minimum prudential requirements to be fulfilled on a consolidated basis from January 1, 2026.

According to the information received, the Pillar 2 Requirement ("P2R") for BCP from January 1, 2026, is 2.15%, which represents a decrease of 10 bp, reflecting a more favourable assessment from the Supervisor on the Bank's global risk.

The decisions referred above establish the minimum own funds requirements determined based on the total value of risk-weighted assets (RWA):

Buffers include the capital conservation buffer (2.5%), the buffer for other systemically important institutions (O-SII: 1.0%), Countercyclical Capital Buffer (CCyB: 0.80%; proforma in September 2025: weighted average of exposures by country by their respective countercyclical reserve, of which 0.75% for exposures in Portugal in accordance with Notice 7/2024 of the Bank of Portugal and 1% for exposures in Poland, recalculated

quarterly) and the Sectoral Systemic Risk buffer of 0.27% (variable, corresponding to 4% on the amount of risk exposures on the retail portfolio of loans to individuals collateralized by residential properties located in Portugal, calculated in pursuant to paragraph 3 of article 92 of Regulation (EU) 575/2013, at the highest level of consolidation in Portugal, considering the applicable legal framework).

The estimated ratios as of September 30, 2025, on a consolidated basis, exceed the minimum required CET1, Tier 1 and total ratio by a wide margin, including all the reserves mentioned above, demonstrating the Bank's solid capitalization.

AWARDS AND DISTINCTIONS

Millennium bcp received several distinctions in the first nine months of 2025:

- Millennium bcp distinguished at the Euromoney Awards of Excellence 2025, as Best Bank for SMEs and Best Investment Bank for Financing in Portugal.
- Millennium bcp distinguished at the "2025 Fosun Mid-Year Awards".
- "Consumer Choice" award in 2025 for the fifth consecutive year in the "Large Banks" category. Leadership in attributes such as "innovation" or "loyalty" contributed to this distinction. Among the strengths highlighted by consumers who participated in the study, in-person and online service and digital efficiency stand out.
- Renewed its status as leader in the 'Large Banks' and 'banking apps' categories, for the third consecutive year, for the Prémio Cinco Estrelas.
- "Best Investment Bank in Portugal" for the seventh consecutive year, within the scope of the World's Best Investment Banks Awards attributed by Global Finance magazine.
- "Best Private Bank in Portugal" for the second consecutive year, an award attributed by The Banker and Professional Wealth Management magazines – two Financial Times group publications specializing in banking and the financial services sector – as part of the Global Private Banking Awards 2025.
- "The Best Bank for Sustainable Finance in Portugal" in 2025 according to Global Finance magazine.
- Millennium bcp is included in the "Europe's Climate Leaders 2025" ranking for the fifth consecutive time.
- Distinguished at the Euronext Lisbon Awards 2025 in the categories of: Equity Champion (listed company with the highest total return), Local Market Member - Equity (member with the highest value traded on Euronext Lisbon in this category), Market Member - Bonds (member with the highest value traded on Euronext Lisbon in this category), Structured Finance - Warrants and Certificates (member that generated the greatest growth in the securities identified in this category).
- Distinguished as the Best Distributor of Structured Products in Portugal by Structured Retail Products, an institution of the Euromoney Group.
- Millennium bcp distinguished at the IRGA Awards (Investor Relations and Governance Awards) in the categories of best CEO and best IRO (Investor Relations Officer).
- Millennium bcp wins "Estatuto Inovadora COTEC" for the 5th consecutive year.
- "Best Customer Experience Solution" at the Finovate Awards and the Silver Award in the "Business Banking Innovation" category at the Qorus-Infosys Financial Banking Innovation Awards 2025.
- The "Nunca o zero value tanto" mortgage loans campaign of Millennium bcp was awarded Gold in the "Banking, Finance and Insurance" category at the M&P Comunicação awards promoted by the newspaper Meios & Publicidade.

ActivoBank also received several distinctions in the first nine months of 2025:

- “Consumer Choice” award for the seventh consecutive time in the “Digital Bank” category in 2025. The independent evaluations, which result from consumer opinion, once again highlighted the Bank's recognition among the public and loyalty of its Customers.
- “Five Stars” award for the second consecutive year, in the “Digital Banking” category.

Bank Millennium was also distinguished in the first nine months of 2025:

- Bank Millennium was recognized by Global Finance magazine in the "World's Best Digital Bank Awards 2025" in the "Best Digital Bank" category in Poland. The bank was also recognized in 12 other categories, including Best Mobile Banking App, Best Trade Finance Services, Best Integrated Corporate Banking Program, and Best Information Security and Fraud Management (the latter two in Poland and Central and Eastern Europe).
- Bank Millennium distinguished at the Euromoney Awards of Excellence 2025, as Best Digital Bank.
- Bank Millennium is included in the "Europe's Climate Leaders 2025" ranking for the fifth consecutive time.
- Bank Millennium has been distinguished for the second consecutive year as Top Employer Polska in 2025 by the Top Employers Institute and for the 11th consecutive time as Reliable Employer.

Millennium bim was also recognized in the first nine months of 2025:

- Millennium bim recognized at the Euromoney Awards of Excellence 2025, as Best Bank.

BCP Share

In the first nine months of 2025, BCP shares outperformed the European banking sector benchmark index, the STOXX® Europe 600 Banks, rising 62.1% compared with the index's 46.5% increase over the same period. This performance was underpinned by the resilience of net interest income, supported by the growth in business volumes, the reduction in charges associated with the CHF-denominated mortgage loan portfolio, and the Bank's sound capital and liquidity position.

The shares also benefited from a more favorable macroeconomic environment, characterized by easing trade tensions, stabilizing inflation in the euro area, and improved economic growth prospects. The Group's H1'25 results, published on 30 July, reached €502.3 million (+3.5% YoY), reinforcing investor confidence and leading analysts to issue 14 upward price target revisions.

On 25 August 2025, BCP announced the completion of the share buyback programme initiated on 14 April 2025, through which 309,362,863 shares were repurchased for a total consideration of €199,999,980, equivalent to 2.05% of the Bank's share capital. Still in August, BCP was included in the MSCI World Standard Index, which comprises major listed companies from developed markets.

In September 2025, Goldman Sachs initiated coverage of BCP. By the end of the month of September, among analysts who regularly cover BCP, 63% (12 analysts) had a "buy" recommendation, 32% (6 analysts) maintained a "neutral" stance, and 5% (1 analyst) had a "sell" recommendation. The average price target for BCP shares at the end of September 2025 stood at €0.78, representing an increase of 22 cents from €0.56 in December 2024 and of 38 cents from the average price target in December 2023.



Source: Euronext, Refinitiv

Qualified Holdings

The following Shareholders held more than 5% of the share capital of Banco Comercial Português, S.A. as of June 30, 2025:

30 September 2025

Shareholder	Nr. of shares	% of share capital	% of voting rights
Chiado (Luxembourg) S.à.r.l. (Fosun Group)	3,027,936,381	20.03%	20.03%
TOTAL FOR FOSUN GROUP	3,027,936,381	20.03 %	20.03 %
Sonangol - Sociedade Nacional de Combustíveis de Angola, EP	2,946,353,914	19.49%	19.49%
TOTAL FOR SONANGOL GROUP	2,946,353,914	19.49%	19.49%
Total of qualifying shareholdings	5,974,290,295	39.52%	39.52%

Economic environment

In October, the International Monetary Fund revised upwards its projections for the growth of world economic activity in 2025 from 3.0% to 3.2%. This revision reflects a lower-than-expected tariff shock, as well as an improvement in financial conditions, despite the persistence of risks associated with geopolitical tensions, geoeconomic fragmentation, disruptions in global supply chains and fiscal pressures. Nevertheless, headline inflation remains on a downward path, contributing to the expectation of continued or less restrictive monetary policies and to the reduction of risk premia in financial markets.

In the euro area, the European Central Bank kept policy rates unchanged in September, interrupting the cycle of interest rate cuts that prevailed between June 2024 and June 2025. The ECB's deposit rate remains at 2.0%, reflecting inflation stabilising near the 2% target and an upward revision of growth to 1.2% in 2025. Future decisions on the level of interest rates will depend on the evolution of economic activity and price stability, in a context still marked by several uncertainty-inducing factors.

Considering the quotations of the derivatives market, a period of greater stability in the evolution of short-term interest rates in the euro area is expected. The yield curve has gained some slope, with the prospect of the end of the interest rate reductions' cycle and a slight improvement in economic activity in the long term. The actual appreciation trend of the euro decelerated slightly, following the significant gains recorded in the first half of the year, despite the asymmetry in the monetary policy cycle vis-à-vis the United States of America.

Political uncertainty in France has not materialised material repercussions on Portugal's sovereign risk. Treasury Bonds presented relatively stable spreads compared to the Germany's equivalent securities, benefiting from the maintenance of the perception of a favourable economic and institutional environment, which materialised again in the form of an upward revision of Portugal's credit rating and also some Portuguese banks, consolidating the investment grade status. GDP grew 0.7% quarter-on-quarter and 1.8% year-on-year in the second quarter. The boost in domestic demand should contribute to an environment of growth in economic activity throughout the year.

In Poland, the economy maintains a robust performance, with GDP growth forecast at 3.6% for 2025, supported by boosting private consumption and public investment. Inflation stabilised at 2.9% in September and the Central Bank of Poland lowered the benchmark rate to 4.5% in October. The unemployment rate (seasonally adjusted) remains low, having reached 3.2% in August.

In Mozambique, the Central Bank continued its monetary easing path, reducing the MIMO rate (Mozambique Interbank Money Market rate) to 9.75% in September, from 11% in May, a decision taken in a context of moderate inflation, of 4.8% in August, and negative GDP growth, of 0.9% in the second quarter (compared to the same period last year). Even so, the economy is progressively recovering from the impact of the instability experienced in the country at the end of 2024, which brought increased challenges in the management of public finances.

Business Model

Nature of operations and main activities

The Group provides a wide variety of banking services and financial activities in Portugal and abroad, where it is present in the following markets: Poland, Mozambique, Angola (through its associate BMA) and China (Macao). All its banking operations develop their activity under the Millennium brand. The Group also ensures its international presence through representation offices and/or commercial protocols.

The Bank offers a vast range of financial products and services: current accounts, payment systems, savings and investment products, private banking, asset management and investment banking, including mortgage loans, personal loans, commercial banking, leasing, factoring and insurance, among others. The back-office operations for the distribution network are integrated to benefit from economies of scale.

In Portugal, Millennium bcp is focused on the retail and companies markets, providing services to its Customers in a segmented manner. The Bank makes products available to Customers through its network of branches, offering a wide range of products and services.

Distinctive factors of the business model

Largest private sector banking institution

BCP is the largest private banking institution in terms of business volume in Portugal, assuming a leading and prominent position in various financial products and services as well as different market segments, with its activity based on a modern branch network with wide coverage at a national level. In addition, the Bank has remote banking channels (banking service by telephone, Mobile Banking and Internet), which act as distribution points for its financial products and services.

The activity in the domestic market focuses on Retail Banking and Companies, which is segmented in order to best serve Customer needs, through a value proposition based on innovation and speed, targeting Mass-market Customers, and through the innovation and customized management of service for Prestige, Business, Private, Companies, Corporate and Large Corporate Customers.

Retail Banking is also developed through ActivoBank, a bank aimed specifically at Customers who are young in spirit, intensive users of new technologies and prefer a banking relationship based on simplicity and offering innovative products and services.

At the end of September 2025, Millennium bcp continued to be the largest Portuguese privately-owned bank on business volumes and with a relevant position in the countries where it operates.

On 30 September 2025, operations in Portugal accounted for 64% of total assets, 69% of total loans to Customers (gross) and 68% of total customer funds. At the end of September 2025, the Bank, in Portugal, had more than 2.8 million active Customers and, at the end of September, market shares of 16.4% of loans to Customers and 18.6% of customer deposits.

International presence as a platform for growth

At the end of September 2025, Millennium bcp had an international presence throughout the world through its banking operations, representative offices and/or commercial protocols, serving more than 7.2 million active Customers.

In Poland, Bank Millennium has a well distributed network of branches, supported by a modern multi-channel infrastructure.

In August 2025, Bank Millennium had a market share of 5.4% in loans to Customers and of 5.7% in deposits.

Concerning the operations in Africa, Millennium bcp operates through Millennium bim, a universal bank that has been operating since 1995 in Mozambique, where it has about 1.3 million Active Customers and is the reference bank in this country, with market shares of 16.6% in loans and advances to Customers and of 21.1% in deposits, in the end of August 2025. Millennium bim is a highly reputed brand in the Mozambican market, associated with innovation, strong penetration in terms of electronic banking and exceptional capacity to attract new Customers, as well as being a reference in terms of profitability.

On 22 April 2016, the deed of the merger of Banco Millennium Angola, S.A. with Banco Privado Atlântico, S.A. was signed. The bank resulting from the merger is an associate of Banco Comercial Português, consolidated by the equity method.

The Group also operates in the Far East since 1993. The activity of the existing branch in Macau was expanded in 2010, through the attribution of a full license (onshore) aimed at establishing an international platform for business operations between Europe, China and Portuguese-speaking African countries.

The Bank also has 4 representation offices (1 in the United Kingdom, 2 in Switzerland and 1 in China, in Guangzhou) and 1 commercial protocol (France).

Growth based on digital/mobile banking

Since its incorporation, the Bank has been recognized by the innovation. The Bank was the first in Portugal to introduce specific innovative concepts and products, including direct marketing methods, branch formats based on Customer profiles, salary accounts, simplified branches ("NovaRede"), telephone banking services, through Banco 7, which later became the first online banking services platform, health insurance (Médias) and direct insurance, and a website dedicated to individual Customers and corporate banking. The Bank was also a pioneer in the launching of a new Internet Banking concept, based on the ActivoBank platform, which provides a simplified service to the Customer, including the opening of a current account using Mobile Banking solutions.

In the first nine months of 2025, noteworthy is the strong growth in the number of mobile transactions, in year-on-year terms:

- +14% in transactions (+17% national transfers; +61% # account openings, +78% # approval letter signatures in the App);
- +15% in sales (+48% # personal loans; +58% # investment funds, +39% # scheduling of mortgage deeds in the App).

The number of digital interactions increased by 11% year-on-year, from 515 million to 572 million.

Digital transactions remained at 99.6%, with a continued reduction in ATM transactions in contrast to the increase in digital transactions.

Digital sales increased slightly to 85%, with a notable increase in sales made through the App.

The Millennium App leads in the ratings of technological platforms with scores very close to the maximum value (5).

Closer to its Customers

At the Group level, BCP surpassed 7.2 million active customers, with a highlight being mobile

customers who increased by 9% (+437,000 customers), reaching 5.3 million, representing a penetration rate of 74% of active customers. In September 2024, mobile customers totalled 4.9 million and the penetration rate was 71%.

In Portugal, BCP has almost 2.9 million active customers, which clearly demonstrates the confidence placed in BCP, and with regard to mobile customers, it maintained a growth trend, having increased by 10% (+163,000 customers) compared to September 2024. It reached more than 1.8 million mobile customers, representing 66% of the active customer base in Portugal, compared to 62% in the same period last year.

Based on the Bank's distinctive competencies and quality of service, customers continue to consistently reward BCP, having been selected as "Consumer Choice" for the 5th consecutive year. The bank was also once again distinguished with the 5-Star award among the Large Banks and in the Banking Apps category. In the business segment, Millennium bcp was distinguished as the "Leading Bank for Businesses" in the DATA E 2024 Study, and was also considered by Portuguese businesspeople as the "Bank with the Products Best Suited to Businesses", the "Most Innovative Bank", the "Closest Bank" and the "Most Efficient".

Business Model Sustainability

The Bank, aiming to strengthen its sustainability and responsible finance offering and performance, continued to lead a transformative dynamic of adapting to ESG (Environmental, Social, and Governance) requirements that allowed it to meet the needs of its Customers, the expectations of supervisors, and, in general, the ambitions of its stakeholders in these areas of activity.

Within the framework of its governance and decision-making model, the Bank has a Board of Directors Committee responsible for Corporate Governance, Ethics, and Sustainability, and a Sustainability Committee reporting to the Executive Committee and led by the CEO. It also has a Sustainability Master Plan (SMP), a management tool that coherently and coherently encompasses the multidisciplinary actions to be developed within the scope of ESG across all of the BCP Group's operations.

The Bank intervention is thus divided into three fundamental axes: (i) Environmental, aiming at the implementation of measures that foster a fair and inclusive transition to decarbonized economic development models, including the incorporation of the climate dimension into the Bank's risk models and the commercial offering of solutions, products and services; (ii) Social, which ensures and promotes, together with the Millennium bcp Foundation, engagement with

the external community and the internal community in establishing lasting relationships of proximity and cooperation and in the creation of shared value; and (iii) Corporate Governance, promoting the integration of Sustainability principles into the Bank's decision-making and control processes, in the management of its supply chain and in the definition of its value proposition.

This alignment with Sustainability principles is central to the Bank, and to organizations in general, remaining a privileged means of determining the social and environmental impact of its activities. The Bank remained aware of its competitive, reputational, and business advantage, incorporating environmental, social, and governance factors, opportunities, and risks into its decision-making processes and reflecting them in the offering of solutions, products, and services.

This Sustainability is one of the vectors of the "Valorizar 28" Strategic Plan, a document that summarizes Millennium bcp's vision, objectives, and value proposition for the 2025-2028 four-year period.

Financial information

Results and Balance Sheet

PROFITABILITY ANALYSIS

NET INCOME

In the first nine months of 2025, the consolidated net income of Millennium bcp amounted to EUR 776 million, corresponding to a 8.7% growth compared to the EUR 714 million achieved in the same period of the previous year and to a return on equity (ROE) of the Group of 14.6%.

The growth of the net income of the Group compared to the first nine months of 2024 was determined by the favourable performance of both the activity in Portugal and the Polish subsidiary, with the results of Millennium bim in Mozambique being lower than those achieved in the same period of the previous year, influenced by the impacts associated with the local sovereign debt.

Compared to the same period of the previous year, net income of the Group benefited from the favourable evolution of core income, results on modification, net trading income and impairments and provisions. Other net operating income and equity accounted earnings were also higher than a year ago although with a less significant impact on the evolution of net income of the Group. On the other hand, there was an increase in operating costs compared to the same period of the previous year.

Core income grew 2.9% (EUR +80 million), to EUR 2,795 million at the end of September of the current year, due to the performance of both net interest income (+2.6%; EUR +56 million) and net commissions (+4.0%; EUR +24 million). The growth in net interest income was due to the performance of international activity, the impact of which was offset by the reduction in the activity in Portugal. Net commissions, in turn, benefited from the performance of the activity in Portugal, since the international activity recorded a decrease, although less expressive, compared to the amount achieved a year earlier.

Results on modification, exclusively recognised in the Polish subsidiary, also contributed largely to the favourable performance of the net income of the Group in the last year, evolving from a negative amount of EUR 62 million in the first nine months of 2024 to an also negative amount of EUR 5 million in the first nine months of 2025 (EUR +57 million). This evolution mainly reflects the recognition in the first nine months of 2024 of the estimated impact of the costs arising from the moratorium program (credit holidays), in the amount of EUR 37 million, non-existent in the first nine months of 2025. Results on modification associated with contractual modifications negotiated with customers with foreign exchange mortgage loans also evolved favourably.

The significant increase of net trading income, from EUR 29 million in the first nine months of 2024 to EUR 81 million in the same period of the current year (EUR +51 million), also contributed largely to the favourable performance of net income of the Group, mainly due to the reduction in costs incurred by the Polish subsidiary in converting mortgage loans granted in Swiss francs, following the agreements with customers, due to the use, in 2025, of provisions booked to face these costs. In the activity in Portugal, net trading income were lower than those recorded in the same period of the previous year.

The favourable performance of net income of the Group was also the result of the reduction in impairment and provisions. Loan impairments charges (net of recoveries) decreased 15.7% (EUR -26 million), totalling, in consolidated terms, EUR 141 million at the end of September 2025. This evolution benefited from the improvement in the international activity, since in the activity in Portugal, there was an increase compared to the same period of the previous year, with this comparison being influenced by the impairment reversals in the second quarter of the previous year. Other impairments and provisions, in turn, decreased 3.4% (EUR -16 million) compared to the amount recognised in the first nine months of 2024, amounting to EUR 444 million at the end of September 2025, benefiting from the improvement in the activity in Portugal, the impact of which was partially offset by the recognition of impairments in the subsidiary in Mozambique, associated with the local sovereign debt.

Other net operating income, that went from a negative amount of EUR 98 million in the first nine months of 2024 to an also negative amount of EUR 97 million in the first nine months of 2025 (EUR +1 million), had a minor impact on the evolution of net income of the Group since the differing performances of the activity in Portugal and the international activity essentially offset each other. In the activity in Portugal, the favourable evolution of this item was driven by the recognition of income amounting to EUR 19 million, following the favourable court decision in the legal challenge concerning the Additional Solidarity on the Banking Sector paid by BCP in 2020, 2021 and 2022 which has since become final and definitive. On the other hand, the increase in mandatory contributions borne by the

Polish subsidiary (EUR +57 million, to EUR 102 million at the end of September 2025) negatively influenced the evolution of other net operating income in the international activity, although this impact was offset by the decrease in costs associated with the foreign exchange mortgage portfolio, also in the Polish subsidiary.

The total impact before taxes and non-controlling interests associated with foreign exchange mortgage portfolio in the Polish subsidiary evolved from a cost of EUR 550 million to a cost of EUR 380 million, continuing to influence the results of the Group, despite this 30.9% reduction.

Despite the disciplined management of costs by the Group, the evolution of net income compared to the same period of the previous year was influenced by the increase of 9.2% (EUR +87 million) in operating costs, to EUR 1,033 million at the end of September 2025.

Both staff costs and other administrative costs as well as amortisation and depreciation were higher than in the same period of the previous year. The most significant increase came from staff costs mainly in the international activity.

In the first nine months of 2025, core operating profit of the Group amounted to EUR 1,763 million, in line (-0.4%) with the amount achieved in the same period of the previous year, since the increase in core income offset the increase in operating costs.

The previous analysis does not exclude the impact of specific items considered in each period in staff costs in the activity in Portugal. In both the first nine months of 2025 and the first nine months of 2024, the impact of specific items before taxes and non-controlling interests was negative in the amount of EUR 3 million. Excluding the impact of specific items in both periods, core operating profit of the Group also remained at the same level as in the same period of the previous year (-0.4%) amounting to EUR 1,766 million, at the end of September of the current year.

In the activity in Portugal, net income in the first nine months of 2025 amounted to EUR 654 million, growing 8.0% from the EUR 606 million achieved in the same period of the previous year.

The favourable performance of net income in the activity in Portugal was largely influenced by the significant reduction in other impairments and provisions to EUR 10 million at the end of September 2025 (-84.3%; corresponding to a reduction of EUR 55 million from the amount posted a year before).

Net income from the activity in Portugal also benefited from the increase in core income, from EUR 1,441 million in the first nine months of 2024 to EUR 1,460 million in the same period of the current year. This evolution reflects, on one hand, the increase of 6.3% (EUR +28 million) in net commissions, to a total of EUR 465 million and on the other hand, the performance of net interest income, which declined by 0.9% (EUR -9 million) over the same period, totalling EUR 995 million in the first nine months of the current year. The increase in net commissions was mainly driven by commissions related to the bancassurance business, reflecting the update of the distribution fees paid by the insurance companies and also the activity increase.

The performance of net income of the activity in Portugal was also influenced by the favourable evolution of other net operating income, from a negative amount of EUR 28 million in the first nine months of 2024 to an also negative amount of EUR 10 million in the same period of 2025 (EUR +18 million), mainly due to the reduction in costs with mandatory contributions borne by the Bank (EUR -20 million, to EUR 22 million at the end of September 2025, including the supervisory fee charged by the ECB).

The reduction in the total amount of mandatory contributions in the activity in Portugal is explained by the fact that, following Constitutional Court Ruling No. 478/2025 issued on 3 June 2025, which declared with general binding force the Solidarity Additional Framework for the Banking Sector unconstitutional, the Bank did not carry out the self-assessment and payment of this tax in the first nine months of 2025. Furthermore, during this period, an amount of EUR 19 million related to the tax paid in 2020, 2021 and 2022 was recognised as income, which compares to a cost of EUR 5 million in the first nine months of the previous year.

Conversely, net income of the activity in Portugal was influenced by the increase of 7.4% (EUR +36 million) recorded in operating costs, which totalled EUR 518 million at the end of September 2025. The evolution of operating costs was mainly due to the increase in staff costs, with other administrative costs and amortisation and depreciation also above the amount recorded in the same period of the previous year, although with a less significant impact on this evolution.

The performance of the activity in Portugal also reflects the favourable evolution of net trading income, from EUR 28 million in the first nine months of 2024 to EUR 11 million in the same period of the current year (EUR -18 million).

Despite the improvement in the risk profile of the loan portfolio in the last year, in the activity in Portugal, loan impairment charges (net of recoveries) that totalled EUR 104 million in the first nine months of 2025, show an increase of 5.7% (EUR +6 million) from the amount recognised in the first nine months of 2024, which had benefited from impairment reversals that occurred in the second quarter of that year.

The impact of the evolution of core income together with operating costs in the activity in Portugal resulted in a reduction of 1.7% in core operating profit, from EUR 959 million in the first nine months of 2024, to EUR 942 million in the first nine months of 2025.

Excluding the specific items mentioned above (negative impacts of EUR 3 million in both the first nine months of 2025 and the first nine months of 2024, both recognized as staff costs), core operating profit in the activity in Portugal also decreased by 1.7% from EUR 962 million to EUR 946 million.

In the international activity, net income of the first nine months of 2025 amounted to EUR 121 million, standing 12.4% above the EUR 108 million recorded in the same period of the previous year. The impact of the improved results obtained by Bank Millennium in Poland more than offset the reduction in the results obtained by Millennium bim in Mozambique.

In fact, net income of Bank Millennium reached EUR 202 million in the first nine months of 2025, showing a significant growth of 59.0% from the EUR 127 million recorded in the same period of the previous year. The performance of the Polish subsidiary was favourably influenced by the reduction in the overall amount of costs associated with the portfolio of foreign exchange mortgage loans, by the increase in core income, by the absence of costs associated with credit holidays, in contrast to the first nine months of 2024, and by a reduction in impairments and provisions. Conversely, there was an increase in the mandatory contributions to which the Polish subsidiary is subject and in operating costs.

Regarding Millennium bim in Mozambique, net income amounted to EUR 25 million at the end of the first nine months of 2025, significantly below (-60.0%) the amount recorded in the first nine months of 2024. This performance was strongly influenced, as already mentioned, by the impacts associated with the sovereign debt, which resulted in a significant increase in impairment and provisions. Although to a lesser extent, the evolution of net income of Millennium bim in Mozambique also reflects the increase in operating costs and in loan impairments. Core income, in turn, contributed positively to the evolution of the results of the Mozambican subsidiary compared to the first nine months of 2024, benefiting from net interest income increase, driven by the decrease in the local requirement for non-remunerated cash reserves to be maintained with the central bank, in January 2025.

The contribution of the Angolan operation to the results of the international activity, through the appropriation of the results of Banco Millennium Atlântico recognised in equity accounted earnings, amounted to EUR 3 million in the first nine months of the current year, corresponding to an increase of more than 60% compared to the same period of the previous year.

In the international operations, core operating profit recorded an increase of 1.2%, rising from EUR 811 million in the first nine months of 2024, to EUR 821 million in the first nine months of 2025, as the increase in core income more than offset the increase in operating costs.

NET INTEREST INCOME

In the first nine months of 2025, net interest income of the Group reached EUR 2,167 million, growing 2.6% from the EUR 2,111 million posted in the same period of the previous year, with the reduction recorded in the activity in Portugal being largely offset by the increase in the international activity.

In fact, net interest income, in the activity in Portugal, totalled EUR 995 million in the first nine months of 2025, standing 0.9% below the EUR 1,003 million recorded in the first nine months of 2024.

The performance of net interest income in the activity in Portugal compared to the first nine months of the previous year reflects above all, the lower income generated by the customer loan portfolio, partially offset by the lower cost of funding and by the higher income generated by the securities portfolio.

The reduction in income generated by the customer loan portfolio compared to the first nine months of the previous year reflects above all the interest rates decrease, with the slight increase in the average portfolio balance being insufficient to offset this effect.

On the other hand, reflecting the evolution of interest rates in the last year, costs associated with the remuneration of deposits from customers decreased from the first nine months of 2024. The average

balance of interest-bearing deposits increased in this period, although its impact was not significant in this evolution.

Also influenced by the decrease in interest rates, the costs incurred with issued debt and subordinated debt were lower compared to the amount recorded in the first nine months of the previous year. In addition, the decision of the Bank to exercise, in October 2024, its option to early redeem in whole its EUR 350 million senior preferred issue, replacing it in the same month with another issue of senior preferred debt securities in the amount of EUR 500 million, under the Bank's Euro Note Programme, aiming to comply with the requirements known as "MREL" (Minimum Requirements for Own Funds and Eligible Liabilities), with a more favourable rate, also contributed to this evolution. Additionally, in March 2025, the Bank early redeemed the entirety of a subordinated debt issuance amounting to EUR 450 million and partially repurchased another issue of the same nature, contributing to a reduction in costs related to the issued subordinated debt. Conversely, in that same month, a new issuance of Tier 2 subordinated debt securities under its Euro Note Programme, amounting to EUR 500 million was carried out. In June 2025, a new MREL-eligible EUR 500 million senior preferred debt issue was completed to refinance the early redemption of an issue of the same size and instrument, announced to the market at the end of September and subsequently completed in October.

The increase in income generated by the securities portfolio also contributed favourably to the evolution of net interest income, due to the increased contribution of income generated by the sovereign debt portfolio, arising from the positive impact of the increased size and turnover of the portfolio.

The evolution of net interest income in the activity in Portugal was also influenced by the reduction, compared to the amount recorded a year earlier, in the income generated by liquidity deposited in Banco de Portugal.

In the international activity, net interest income amounted to EUR 1,172 million in the first nine months of 2025, showing a growth of 5.8% from the EUR 1,107 million accounted in the first nine months of 2024.

This evolution benefited from the favourable performance of both the Polish and the Mozambican subsidiaries despite the less significant impact of the latter. The increase in net interest income in the Polish subsidiary was largely due to the higher income generated by the securities portfolio. The performance of the subsidiary in Mozambique benefited from the reduction in the local requirement for non-remunerated cash reserves to be maintained with the central bank, in January 2025.

In consolidated terms, net interest margin went from 3.05% in the first nine months of 2024 to 2.92% in the first nine months of 2025.

In the activity in Portugal, net interest margin, mainly influenced by the decrease in interest rates underlying loans to customers, evolved from 2.24% in the first nine months of 2024, to 2.10% in the first nine months of 2025. Over this period, the 6-month Euribor decreased from 3.71% to 2.23% (average recorded over the first nine months of 2024 and 2025, respectively).

Net interest margin in the international activity, in turn, evolved from 4.55% in the first nine months of 2024, to 4.37% in the first nine months of 2025, reflecting the reduction in this indicator recorded at the subsidiary in Poland. It is noteworthy that, in May, July and September of 2025, the central bank of Poland reduced the reference interest rates. In Mozambique, despite the continuation of the interest rate reduction cycle started in 2024 by the central bank, the reduction in January 2025 of the local requirement for non-remunerated cash reserves allowed the net interest margin at the Mozambican subsidiary to evolve favourably over the past year.

EQUITY ACCOUNTED EARNINGS AND DIVIDENDS FROM EQUITY INSTRUMENTS

Equity accounted earnings together with dividends from equity instruments, which comprise dividends and equity income received from investments classified as financial assets at fair value through other comprehensive income and as financial assets held for trading, totalled EUR 45 million at the end of September of the current year, slightly above the amount recorded at the end of September 2024.

This evolution was determined by the increase of 1.9% (EUR +1 million) recorded in equity accounted earnings of the Group which, in the first nine months of 2025, totalled EUR 45 million.

In the activity in Portugal, equity accounted earnings totalled EUR 40 million, in line (-0.4%) with the amount posted in the first nine months of the previous year, while in the international activity equity accounted earnings increased 29.3%, to EUR 4 million at the end of September 2025. The increase in the

amount associated with the appropriation of the results generated by Banco Millennium Atlântico in Angola contributed to the evolution of this item.

Dividends from equity instruments, arising exclusively from the activity of the Polish subsidiary in both years, amounted to EUR 1 million in the first nine months of 2025, 2.3% below the amount recorded in the same period of the previous year.

NET COMMISSIONS

In the first nine months of 2025, net commissions totalled EUR 629 million, showing a growth of 4.0% compared to the EUR 605 million recorded in the same period of the previous year. This evolution was mainly due to the performance of the activity in Portugal, since in the international activity, net commissions decreased compared to the amount posted a year earlier, although the decrease was less pronounced.

In consolidated terms, the favourable performance of net commissions was due to the growth of both banking commissions and market related commissions.

In fact, banking commissions of the Group stood 2.1% (EUR +11 million) above the amount posted in the first nine months of the previous year, reaching EUR 525 million at the end of September of the current year, while market related commissions increased 14.9% (EUR +13 million), totalling EUR 103 million in the first nine months of the year.

NET COMMISSIONS

	million EUR		
	9M25	9M24 (restated)	Chg. 25/24
BANKING COMMISSIONS	525	515	2.1 %
Cards and transfers	199	194	3.0 %
Credit and guarantees	96	95	0.6 %
Bancassurance	104	104	(0.5 %)
Management and maintenance of accounts	124	119	4.3 %
Other commissions	2	3	(3.8 %)
MARKET RELATED COMMISSIONS	103	90	14.9 %
Securities operations	37	32	15.6 %
Asset management and distribution	67	58	14.5 %
	629	605	4.0 %
Of which:			
Activity in Portugal	465	438	6.3 %
International activity	163	167	(2.2 %)

In the activity in Portugal, net commissions amounted to EUR 465 million in the first nine months of 2025, corresponding to a growth of 6.3% from the EUR 438 million recorded a year before, reflecting the favourable evolution of both banking commissions and market related commissions.

In fact, banking commissions, in the activity in Portugal, increased 5.6% (EUR +21 million) totalling EUR 388 million in the first nine months of 2025, while commissions related to markets increased 10.1% (EUR +7.1 million), totalling EUR 77 million at the end of September 2025.

The performance of net commissions related to the banking business in the activity in Portugal benefited largely from the growth of commissions associated with the bancassurance activity, reflecting the growth of the activity and the update of the distribution fees paid by the insurance companies. Commissions associated with management and maintenance of accounts and with credit and guarantees, in turn, also performed favourably compared to the first nine months of the previous year. On the other hand, commissions related to cards and transfers, which include amounts charged for

transactions carried out with cards and the respective payment networks, for bank transfers and for the use of points of sale (POS), were below the amount recorded a year earlier.

Commissions related to markets, in the activity in Portugal, in turn, benefited from the momentum of both commissions related to securities operations and asset management and distribution commissions.

In the international activity, net commissions amounted to EUR 163 million in the first nine months of the current year, decreasing by 2.2% (EUR -4 million) from the amount recorded in the same period of the previous year, mainly due to the performance of the Mozambican subsidiary. This evolution was largely due to the reduction in commissions related to banking business.

NET TRADING INCOME

In the first nine months of 2025, net trading income amounted to EUR 81 million, well above the amount of EUR 29 million posted in the same period of the previous year, largely influenced by the lower impact of costs incurred by the Polish subsidiary in converting mortgage loans granted in Swiss francs, following the agreements with customers.

In the activity in Portugal, net trading income evolved from EUR 28 million in the first nine months of 2024 to EUR 11 million in the first nine months of 2025.

In the international activity, the evolution of net trading income, from EUR 1 million to EUR 70 million at the end of September of the current year, was determined by the reduction in costs incurred by the Polish subsidiary in converting mortgage loans granted in Swiss francs, following the agreements with customers, from EUR 67 million in the first nine months of 2024 to EUR 5 million in the first nine months of 2025, due to the use, in this period, of provisions booked to face these costs.

In the operation in Mozambique, net trading income did not change materially compared to the same period of the previous year.

OTHER NET OPERATING INCOME

Other net operating income includes, among others, the costs associated with the resolution and the deposit guarantee funds as well as with other mandatory contributions and with other taxes applicable to the banking sector, both in the activity in Portugal and in the international activity.

In the first nine months of 2025, other net operating income totalled a negative amount of EUR 97 million, that compares to the also negative amount of EUR 98 million recorded in the first nine months of the previous year. In this evolution, the favourable performance of the activity in Portugal stands out, although its impact was almost entirely offset by the performance of international activity compared to the first nine months of 2024.

In fact, in the activity in Portugal, other net operating income evolved from a negative amount of EUR 28 million in the first nine months of 2024 to an also negative amount of EUR 10 million at the end of September 2025. To this favourable evolution contributed, on one hand the reduction in the costs with mandatory contributions and on the other the gains recognised with the sale of assets.

The overall amount of mandatory contributions in the activity in Portugal, including the supervisory fee charged by the ECB, evolved from EUR 42 million in the first nine months of 2024 to EUR 22 million in the same period of 2025, corresponding to a 47.0% reduction in this period.

This evolution is largely due, on one hand, to the fact that in the first nine months of 2025 the Additional Solidarity charge for the Banking Sector was not paid, and on the other, an amount of EUR 19 million related to the tax paid in 2020, 2021 and 2022 was recognised as income, which compares to a cost of EUR 5 million recognised in the first nine months of the previous year. In fact, following the Constitutional Court Ruling No. 478/2025 issued on 3 June 2025, which declared the Solidarity Additional Framework for the Banking Sector unconstitutional with general binding force, the self-assessment and payment of the tax, which according to the rules previously in force would have been due by 30 June 2025, was not made. The income recognised in the first nine months of 2025 results from a favourable court decision in the legal challenge concerning the Additional Solidarity on the Banking Sector paid by BCP in 2020, 2021 and 2022 which has since become final and definitive. The amounts related to the Additional Solidarity on the Banking Sector for 2023 and 2024, which are still being contested in court, amount to a total EUR 12 million.

On the other hand, the overall amount of the remaining mandatory contributions in the activity in Portugal showed an increase from the amount posted in the first nine months of 2024, mainly justified by the contribution to the National Resolution Fund (FRN). In fact, the contribution to the FRN increased by more than 56% over the last year, from EUR 6 million to EUR 10 million in the first nine months of 2025, mainly due to the increase in the contribution rate from 0.032% to 0.049%. The cost incurred with the contribution on the banking sector, in turn, went from EUR 28 million to EUR 29 million, while the contribution to the deposit guarantee fund assumed an immaterial amount in the scope of this analysis.

Finally, it should be noted that the Single Resolution Board determined that, since the Single Resolution Fund (SRF) had reached its target level, no ex-ante contributions would be charged in 2025, similarly to 2024.

The favourable evolution of gains recognised from the disposal of assets resulted from the increase in gains associated with financial holdings, the impact of which was partially offset by the lower results from the disposal of non-current assets held for sale.

In the international activity, other net operating income evolved from a cost of EUR 70 million in the first nine months of 2024 to a cost of EUR 87 million in the same period of the current year.

This evolution of other net operating income was determined by the contribution of the Polish subsidiary, whose performance was strongly influenced by the increase in costs related to mandatory contributions to which the subsidiary is subject. This impact was, however, offset in particular by the reduction in costs associated with foreign exchange mortgage loan portfolio recognised under this item.

In fact, costs associated with mandatory contributions borne by the Polish subsidiary more than doubled, evolving from EUR 45 million in the first nine months of 2024 to EUR 102 million in the same period of the current year. This increase was mainly due to the cost of the special tax on the Polish banking sector, the payment of which had been suspended following the activation of the Bank Millennium Recovery Plan at the beginning of the second half of 2022. With the completion, in June 2024, of the aforementioned Recovery Plan, Bank Millennium was again subject to the payment of this tax, which totalled EUR 31 million at the end of September 2024 and EUR 71 million at the end of September 2025. In turn, the contribution of Bank Millennium to the deposit guarantee fund, previously suspended following the contribution to IPS (Institutional Protection Scheme) in 2022, reached EUR 13 million in the first nine months of 2025, thus contributing to the increase of the overall amount of the mandatory contributions compared to the first nine months of 2024. The contribution to the resolution fund by the Polish subsidiary was also higher compared to the amount recognised in the first nine months of 2024, although with a less significant impact on the evolution of this item (EUR 18 million in the first nine months of 2025 vs EUR 14 million in the same period of 2024).

On the other hand, the impacts associated with foreign exchange mortgage loan portfolio, as far as this item is concerned, evolved significantly from costs of EUR 31 million in the first nine months of 2024 to gains of EUR 12 million in the first nine months of 2025. This performance mainly reflects the reduction in court costs related to the counterclaims filed by Bank Millennium for reimbursement of the amounts owed by customers. Furthermore, the compensation for costs incurred with the booking of provisions to address the legal risk implicit in foreign exchange mortgage loans to be reimbursed from a third party, following the indemnity clauses and contractual guarantees provided for in the acquisition contract of Euro Bank S.A., also increased compared to the same period of the previous year, totalling EUR 45 million at the end of September 2025.

OPERATING COSTS

In the first nine months of 2025, operating costs totalled EUR 1,033 million, standing 9.2% above the EUR 946 million recorded in the same period of the previous year. Despite the disciplined management of costs followed by the Group, operating costs were higher than those recorded a year earlier, both in the activity in Portugal and in the Polish subsidiary and to a lesser extent also in the Mozambican subsidiary.

OPERATING COSTS

	million EUR		
	9M25	9M24 (restated)	Chg. 25/24
Staff costs	575	523	10.1 %
Other administrative costs	342	316	8.2 %
Amortisation and depreciation	116	107	7.6 %
	1,033	946	9.2 %
Of which:			
Activity in Portugal	518	482	7.4 %
International activity	515	463	11.0 %

The amounts presented do not exclude the impact of specific items recognised in staff costs in the activity in Portugal: a negative impact in the amount of EUR 3 million, in each period of 2025 and 2024.

Excluding the specific items mentioned above, operating costs of the Group amounted to EUR 1,029 million, standing 9.2% above the EUR 943 million accounted in the first nine months of 2024. This increase was determined by the performance of staff costs (+10.0%, EUR +52 million), reflecting both the performance of the activity in Portugal and mainly the international activity, namely the Polish subsidiary. Other administrative costs and amortisation and depreciation also increased compared to the first nine months of 2024, both in the activity in Portugal and in the international activity, having increased in consolidated terms by 8.2% (EUR +26 million) and 7.6% (EUR +8 million), respectively.

Excluding the specific items mentioned above, cost-to-income ratio evolved from 35.0% to 36.4% and cost-to-core income from 34.7% to 36.8% in the period under review.

Cost-to-income and cost-to-core income stated ratios evolved, respectively, from 35.1% to 36.6% and from 34.8% to 36.9%.

In the activity in Portugal, operating costs totalled EUR 518 million in the first nine months of 2025, standing 7.4% above the EUR 482 million posted in the first nine months of 2024.

Excluding the specific items mentioned above, operating costs in the activity in Portugal increased 7.3%, from EUR 480 million to EUR 515 million.

The evolution of operating costs in the activity in Portugal, not considering the effect of specific items, reflects the increases of 6.3% (EUR +17 million) recorded in staff costs, of 7.8% (EUR +12 million) in other administrative costs and of 11.4% (EUR +6 million) in amortisation and depreciation.

Excluding the impact of specific items, cost-to-income ratio in the activity in Portugal evolved from 32.4% to 34.3%, while cost-to-core income ratio went from 33.3% to 35.2% in the last year. Cost-to-income and cost-to-core income stated ratios stood at 34.5% and 35.5% in the first nine months of 2025, levels that compare respectively with 32.5% and 33.5% in the first nine months of the previous year.

In the international activity, operating costs totalled EUR 515 million in the first nine months of 2025, standing 11.0% above the EUR 463 million accounted in the same period of the previous year. This evolution was mainly due to the performance of the Polish subsidiary, although in the subsidiary in Mozambique operating costs were also higher than those recorded in the first nine months of 2024.

The evolution of operating costs in the international activity was due to the increases of 14.3% (EUR +35 million) in staff costs, of 8.6% (EUR +14 million) in other administrative costs and of 3.7% (EUR +2 million) in amortisation and depreciation.

The cost-to-income ratio of the international activity evolved from 38.3% in the first nine months of 2024 to 38.9% in the same period of the current year, while cost-to-core income ratio in turn, went from 36.4% to 38.5% in the last year.

STAFF COSTS

In the first nine months of 2025, staff costs totalled EUR 575 million, standing 10.1% above the EUR 523 million accounted in the same period of the previous year. Both in the activity in Portugal and mainly in the international activity, staff costs were higher than a year before. Not considering the impact of the specific items², staff costs of the Group increased 10.0% from the EUR 520 million accounted for in the first nine months of the previous year, amounting to EUR 572 million, at the end of September of the current year.

In the activity in Portugal, stated staff costs amounted to EUR 295 million at the first nine months of 2025, standing 6.4% above the EUR 278 million recorded in the same period of the previous year³.

Despite the hiring of new employees with specific skills, namely on digital, new technologies and internal control areas, the number of employees in the activity in Portugal remained stable (51 employees fewer than on 30 September 2024), standing at 6,224 employees at the end of September 2025.

In the international activity, staff costs amounted to EUR 280 million in the first nine months of 2025, standing 14.3% above the EUR 245 million recorded a year before. The Polish subsidiary was mainly responsible for this evolution, although the subsidiary in Mozambique also contributed to the increase in staff costs compared to the same period in the previous year, albeit to a lesser extent.

In the Polish subsidiary, the evolution of staff costs continued to be determined by the strong pressure on basic wages and by the current scenario of the Polish labour market, with very low unemployment rates in the country. The increase in the total number of employees of this subsidiary, from 6,819 employees (6,696 FTE - full-time equivalent) at the end of September 2024, to 6,943 employees (6,824 FTE - full-time equivalent) on 30 September 2025, also contributed to the increase in staff costs in the period under review.

The operation in Mozambique, in turn, increased its headcount, from 2,622 employees on 30 September 2024 to 2,688 employees at the end of September 2025, an increase that, together with the salary update, contributed to the growth in staff costs in the last year.

As of 30 September 2025, the headcount of the international activity consisted of 9,631 employees, which compares to 9,441 employees at the end of September 2024.

OTHER ADMINISTRATIVE COSTS

Notwithstanding the disciplined management of costs followed by the Group, other administrative costs were 8.2% above the EUR 316 million recorded in the first nine months of the previous year, totalling EUR 342 million in the same period of the current year. This evolution reflects the increase in costs both in the activity in Portugal and in the international activity.

In the activity in Portugal, other administrative costs amounted to EUR 162 million, corresponding to an increase of 7.8% from the EUR 150 million recorded a year ago.

Despite the implementation of a series of recurrent measures to optimise the cost structure of the Bank, this performance largely reflects the increase in costs associated to outsourcing and independent labour. Costs associated with information technology services, advisory services, including support on regulatory matters, as well as costs related to other specialised services, advertising, rents and leases and costs with water, electricity and fuel, among other costs with a less significant impact on the evolution of this item, were also higher than a year before. Conversely, costs associated with legal expenses represent the main reduction compared to the first nine months of 2024.

² Specific items: negative impact of EUR 3 million in both the first nine months of 2025 and the first nine months of 2024. In both periods, specific items were recognised in staff costs in the activity in Portugal including costs with employment terminations, namely early retirements and indemnifications. In the first nine months of 2025, specific items also include a reversal of costs with mortgage financing to former employees and in the first nine months of 2024, an income recognised after an agreement related to liabilities with former directors of the Bank.

³ Not considering the impact of the specific items, the increase was 6.3%, from EUR 275 million to EUR 292 million in the period under review.

In the international activity, other administrative costs amounted to EUR 180 million in the first nine months of 2025, representing a 8.6% increase from the EUR 166 million posted in the same period of the previous year, mainly reflecting the increase recorded in the Polish subsidiary, but also in the Mozambican subsidiary.

The Group maintains a process of optimisation of its branch network in order to efficiently serve the markets in which it is present. On 30 September 2025, the activity in Portugal had a network of 394 branches, 3 less than at the end of September 2024, while in the Polish subsidiary, the number of branches decreased from 610 branches at the end of September 2024 to 592 branches on 30 September 2025. The subsidiary in Mozambique, in turn, ended September 2025 with 195 branches, unchanged from the end of September 2024.

AMORTISATION AND DEPRECIATION

Amortisation and depreciation amounted to EUR 116 million in the first nine months of 2025, standing 7.6% above the amount recorded in the first nine months of 2024.

In the activity in Portugal, the increase in amortisation and depreciation was of 11.4%, from EUR 55 million in the first nine months of 2024, to EUR 61 million in the same period of 2025, reflecting the investment made in hardware and software, given the Bank's commitment to the digital and technological transformation process.

In the international activity, amortisation and depreciation amounted to EUR 55 million at the end of September 2025, standing 3.7% above the EUR 53 million recorded in the first nine months of 2024, reflecting the performance of both the Polish subsidiary and mainly the Mozambican subsidiary.

RESULTS ON MODIFICATION

In the first nine months of 2025, results on modification totalled a negative amount of EUR 5 million, which compares with an also negative amount of EUR 62 million recorded in the same period of the previous year. In both years, those amounts were exclusively recorded in the Polish subsidiary.

This evolution mainly reflects the recognition, in the first nine months of the previous year, of the estimated impact of the costs arising from the moratorium program (credit holidays), non-existent in the first nine months of 2025. In fact, following the announcement of the legal act of 12 April 2024 introducing, among others, an extension of credit holidays for Zloty mortgage borrowers by four more months in 2024, Bank Millennium estimated the preliminary impact of the implementation of this act, recognising, in the first half of 2024 a cost with credit holidays in the amount of EUR 47 million. Subsequently, in the third quarter of 2024, taking into account the participation of borrowers with mortgages eligible for credit holidays, Bank Millennium reduced the estimated cost of the first half of 2024 to an amount of EUR 37 million at the end of September 2024. It should be noted that, in the fourth quarter of 2024, the Bank reduced again the estimated cost to a final amount of EUR 26 million at the end of December 2024.

Costs associated with contractual modifications negotiated with customers with foreign exchange mortgage loans, in the Polish subsidiary, also contributed to the favourable evolution of the results on modification, by decreasing significantly from EUR 19 million in the first nine months of 2024 to EUR 2 million in the same period of the current year.

LOAN IMPAIRMENTS

In the first nine months of 2025, impairment for loan losses (net of recoveries) totalled EUR 141 million, showing a reduction of 15.7% compared to the EUR 167 million accounted for in the same period of the previous year. This evolution reflects the lower level of provisioning in the Polish subsidiary, the impact of which was offset by the increases in both the activity in Portugal, which had benefited from the reversal of impairments that occurred in the second quarter of 2024, and in the subsidiary in Mozambique.

In fact, in the activity in Portugal, despite the improvement in the risk profile of the loan portfolio, loan impairment charges (net of recoveries) increased 5.7% from the EUR 98 million recognised in the first nine months of 2024, totalling EUR 104 million at the end of September 2025. This comparison is influenced by the reversal of impairments that occurred in the second quarter of the previous year.

In the international activity, loan impairment charges (net of recoveries) stood significantly below (-46.2%) the EUR 69 million recognised in the first nine months of 2024, standing at EUR 37 million at the end of September 2025. This reduction mainly reflects the performance of the Polish subsidiary, influenced by the impact of a loan portfolio sale in the first half of the current year. In the Mozambican subsidiary, loan impairment charges (net of recoveries) were higher than in the first nine months of 2024.

The evolution of loan impairment charges (net of recoveries), in consolidated terms, allowed the cost of risk of the Group, net of recoveries, to improve in relation to the 38 basis points observed in the first nine months of 2024, standing at 31 basis points in the first nine months of 2025. Excluding the previously mentioned impact of certain impairments reversal in the activity in Portugal in the second quarter of the previous year, the cost of risk (net of recoveries) of the Group in the first nine months of 2024 was 49 basis points.

In the activity in Portugal, despite the reversal of the aforementioned impairments in the second quarter of the previous year, cost of risk (net of recoveries) in the first nine months of 2025 remained at 33 basis points, as in the same period of the previous year. Excluding the aforementioned reversal of impairments, the cost of risk in the activity in Portugal in the first nine months of 2024 was 49 basis points, showing a significant improvement in the last year.

In the international activity, cost of risk net of recoveries also improved significantly in the last year, from 49 basis points to 26 basis points in the first nine months of 2025.

OTHER IMPAIRMENT AND PROVISIONS

In the first nine months of 2025, other impairment and provisions totalled EUR 444 million, evolving favourably from the EUR 460 million recorded in the same period of the previous year. This evolution was due to different dynamics regarding the geographies of the Group, as the impact of the reduction in the activity in Portugal was largely offset by the increase in other impairments and provisions recorded in the subsidiary in Mozambique, associated with the local sovereign debt.

In the activity in Portugal, other impairments and provisions showed a significant reduction (-84.3%), evolving from EUR 65 million in the first nine months of 2024 to EUR 10 million in the same period of the current year, mainly reflecting the reduction in provisions for other risks.

In the international activity, other impairment and provisions amounted to EUR 434 million at the end of September 2025, standing 9.9% above the EUR 395 million recorded a year earlier. This performance mainly reflects the recognition of impairments in the subsidiary in Mozambique associated with the sovereign debt of that country. In the Polish subsidiary, although other impairment and provisions were slightly above the amount recognised a year earlier, the provision booked by that subsidiary to face the legal risk associated with foreign exchange mortgage loans was EUR 30 million lower than the amount recognised in the first nine months of 2024, amounting to EUR 355 million at the end of September 2025. On the other hand, the income, reflected in other net operating income, corresponding to the amount receivable from a third party, following the indemnity clauses and contractual guarantees provided for in the acquisition contract of Euro Bank S.A., increased EUR 7 million in the period under review, totalling EUR 45 million in the first nine months of 2025.

INCOME TAX

Income tax (current and deferred) amounted to EUR 317 million in the first nine months of 2025, which compares to EUR 263 million posted in the same period of 2024.

These expenses include, in the first nine months of 2025, current tax of EUR 78 million (EUR 105 million in the first nine months of 2024) and deferred tax of EUR 239 million (EUR 158 million in the same period of 2024).

Current tax expenses in the first nine months of 2024 and 2025 were influenced by provisions for legal risks related to the portfolio of foreign currency mortgage loans and by mandatory contributions to the banking sector, both non-deductible for tax purposes at the level of the Polish subsidiary and by the autonomous taxation of interest on public debt in the Mozambican subsidiary. In 2025, current taxes were still positively influenced by the correction of the 2024 tax estimate of the Polish subsidiary, against the reduction of the respective deferred tax assets, with no impact on net income.

Expenses with the reduction of deferred tax assets in 2024 and 2025 mainly result from the income of the period of the activity in Portugal, by the reduction of deferred tax assets covered by the Special Framework applicable to Deferred Tax Assets ("REAID") given the evolution of the taxable income of those periods.

The evolution of deferred tax assets in 2024 was also influenced, regarding the Polish subsidiary, by the decision of the Supreme Administrative Court (NSA) from 6 December of 2023. In fact, NSA issued a judgment on the rules for recognising the effects in CIT of cancellations of mortgage loans indexed to foreign currencies and foreign currency loans (in particular in Swiss francs) adjudicated by common courts. According to the NSA, the Bank should recognise the tax consequences not by recognising the resulting losses as tax-deductible costs, but by adjusting the revenues from the above-mentioned loans (FX gains, interest, commissions and fees) previously taxed with CIT, taking into account the rules of limitation of tax liabilities. As a result of the analysis of the NSA's judgment, the Bank recognised in the first nine months of 2024 a deferred tax asset in the amount of PLN 271 million (EUR 51 million) based on estimates of future adjustments of interest income, FX gains, commissions and fees earned on mortgage loans indexed to Swiss francs and foreign currency loans in this currency which are the subject of court disputes for their cancellation.

BALANCE SHEET

TOTAL ASSETS

Total assets of the consolidated balance sheet amounted to EUR 108,937 million as of 30 September 2025, showing a growth of 8.7% compared to the EUR 100,226 million recorded at the end of the first nine months of 2024, with this evolution being driven by the increases in assets observed in the activity in Portugal and in the international activity (EUR +4,562 million and EUR +4,149 million, respectively).

In the activity in Portugal, total assets stood at EUR 70,261 million at the end of the first nine months of 2025, representing an increase of 6.9% compared to the EUR 65,699 million recorded on 30 September 2024. This increase was mainly due to the significant growth in the loans to customers portfolio (net of impairment) and to a lesser extent, to the growth in the securities portfolio (primarily in sovereign debt portfolio) and deposits at central banks. The most significant reductions were observed in loans and advances to credit institutions and deferred taxes assets.

In the international activity, total assets amounted to EUR 38,676 million as of 30 September 2025, representing a 12.0% increase compared to the EUR 34,527 million recorded at the end of the first nine months of the previous year. This evolution is explained by the increase in the total assets of the Polish subsidiary, driven by the increase in the securities portfolio (mainly in local public debt) explained by the application of the surplus liquidity resulting from the increase in balance sheet customers funds, partially offset by the decrease in deposits at central banks. Additionally, in the subsidiary in Mozambique, total assets recorded a decrease, attributable to the exchange rate devaluation of the Metical against the Euro, since total assets in local currency increased in this period, with the decrease in deposits at central banks being more than offset by the increase in loans and advances to credit institutions.

LOANS TO CUSTOMERS

Consolidated loans to customers portfolio (gross), as defined in the Glossary, amounted to EUR 61,496 million as of 30 September 2025, representing an 4.9% increase compared to the EUR 58,641 million recorded at the end of the first nine months of the previous year. This evolution reflects a more significant increase in the loans to customer portfolio in the activity in Portugal, along with a stabilisation in the international activity. Loans to companies and mortgage loans showed the strongest growth. Personal loans also showed a positive performance, although with a more moderate impact on the portfolio expansion.

In the activity in Portugal, loans to customers (gross) amounted to EUR 42,579 million on 30 September 2025, 7.2% above the EUR 39,725 million recorded at the end of the first nine months of 2024, driven mainly by the momentum of mortgage loans. This growth incorporates, on the one hand, a significant increase in performing loans (EUR +3,096 million compared to the same date in the previous year) and, on the other, a reduction in non-performing exposures (NPE) (EUR -242 million compared to the same date in the previous year).

Mortgage loans in the activity in Portugal stood at EUR 21,103 million on 30 September 2025, recording an increase of 9.7% (EUR +1,865 million) compared to the same date in the previous year, due to a growing demand, driven by falling interest rates and government incentives aimed at young people.

Personal loans in the activity in Portugal also recorded an increase of 5.5% (EUR +138 million) compared to the figure recorded at the end of the first nine months of 2024, standing at EUR 2,640 million on 30 September 2025.

In turn, loans to companies in the activity in Portugal increased by 4.7% (EUR +851 million) compared to the end of the first nine months of 2024, reaching EUR 18,836 million on 30 September 2025. This positive trend occurs in a context of declining interest rates, but also despite the global uncertainty and the impact of the repayment of Covid lines and the reduction of NPE within this segment.

In the international activity, loans to customers (gross) amounted to EUR 18,917 million as of 30 September 2025, broadly in line with the figure recorded on the same date of the last year (30 September 2024: EUR 18,915 million). The portfolio remained stable in both the Polish and Mozambican

subsidiaries, with the latter recording an increase in loans denominated in local currency totally offset by the devaluation of the Metical.

Mortgage loans in the international activity totalled EUR 8,541 million on 30 September 2025, below the figure recorded at the end of the first nine months of the previous year (30 September 2024: EUR 9,366 million), with this decline almost entirely explained by the performance of the Polish subsidiary.

The amount of the mortgage loans portfolio in foreign currency in the Polish subsidiary deducted from the portion concerning Euro Bank S.A.⁴ decreased by EUR 248 million (30 September 2025: EUR 152 million; 30 September 2024: EUR 400 million), representing 0.8% of the total amount of loans to customers recorded on the balance sheet of Bank Millennium (2.2% on the same date in the previous year), with an immaterial weight in the consolidated loans to customers portfolio.

Personal loans in the international activity stood at EUR 5,105 million at the end of the first nine months of the current year, recording an increase of EUR 240 million compared to the figure recorded at the end of the first nine months of the previous year, driven mainly by the growth recorded in the Polish subsidiary, benefiting also from the positive contribution of the Mozambican subsidiary.

In turn, loans to companies in the international activity rose by 12.5% compared to the EUR 4,684 million recorded on 30 September 2024, standing at EUR 5,271 million at the end of the first nine months of 2025. This growth was driven by the positive evolution observed in the Polish subsidiary, although mitigated by the reduction recorded in the Mozambican subsidiary.

LOANS TO CUSTOMERS (GROSS)

	30 Sep. 25	30 Sep. 24 (restated)	Chg. 25/24
<i>million EUR</i>			
INDIVIDUALS	37,389	35,971	3.9 %
Mortgage loans	29,644	28,604	3.6 %
Personal loans	7,745	7,367	5.1 %
COMPANIES	24,107	22,670	6.3 %
Services	9,549	8,334	14.6 %
Commerce	4,021	3,940	2.1 %
Construction	1,444	1,526	(5.4 %)
Others	9,093	8,869	2.5 %
	61,496	58,641	4.9 %
Of which:			
Activity in Portugal	42,579	39,725	7.2 %
International activity	18,917	18,915	0.0 %

QUALITY OF CREDIT PORTFOLIO

The Bank has in place credit portfolio management and monitoring processes, namely with regard to the assessment of the risk profile of the exposure in different portfolios/segments. These procedures have the purpose of identifying and closely monitoring the customers potentially more affected by the prevailing macroeconomic context, anticipating possible difficulties in meeting debt obligations and defining credit and performance strategies adjusted to the specificities of each customer/group of customers, with a view to both maintaining support to customers considered viable and mitigating credit risk in cases where there are risks of loss in the exposure value.

The NPE stock, in consolidated terms, stood at EUR 1,599 million on 30 September 2025, showing a reduction of EUR 334 million compared to the end of the first nine months of 2024. In the activity in

⁴ The risk of Euro Bank S.A.'s portfolio is fully covered by a third party, within the scope of the clauses set out in the acquisition contract of that entity.

Portugal, the NPE stock totalled EUR 803 million at the end of the first nine months of 2025, with a reduction of EUR 242 million compared to the same date in the previous year.

The NPL ratio for more than 90 days, on a consolidated basis, stood at 1.3% at the end of the first nine months of the current year, slightly below the 1.4% ratio observed on the same date of the previous year. In turn, the NPE ratio in percentage of the total credit portfolio, on a consolidated basis, decreased from 3.3% on 30 September 2024 to 2.6% on 30 September 2025. In the activity in Portugal, the NPE ratio as a percentage of the total credit portfolio dropped from 2.6% at the end of the first nine months of 2024 to 1.9% at the end of the first nine months of 2025.

In consolidated terms, the ratio between total impairment and the stock of NPL by more than 90 days evolved from 187.3% at the end of the first nine months of 2024 to 172.2% on 30 September 2025. The ratio between total impairment and the stock of NPE showed a significant increase both in consolidated terms (86.8% at the end of the first nine months of 2025 vis-à-vis 80.0% recorded on 30 September 2024) and in the activity in Portugal (95.5% on 30 September 2025 vis-à-vis 87.1% on 30 September 2024). On 30 September 2025, the ratio between impairments allocated to NPE and NPE stock stood at 54.3% in consolidated terms (53.8% on 30 September 2024) and 52.5% in the activity in Portugal (55.1% on 30 September 2024).

CREDIT QUALITY INDICATORS

	Group			Activity in Portugal		
	30 Sep. 25	30 Sep. 24 (restated)	Chg. 25/24	30 Sep. 25	30 Sep. 24 (restated)	Chg. 25/24
STOCK (M€)						
Loans to customers (gross)	61,496	58,641	4.9 %	42,579	39,725	7.2 %
Restructured loans	1,240	1,609	(22.9 %)	727	1,056	(31.2 %)
NPL > 90 days	805	826	(2.5 %)	377	406	(7.1 %)
NPE (Loans to customers)	1,599	1,933	(17.3 %)	803	1,045	(23.2 %)
Total loan impairments (Balance sheet)	1,387	1,547	(10.3 %)	767	910	(15.8 %)
Impairments allocated to NPE (Balance sheet)	868	1,040	(16.5 %)	422	576	(26.8 %)
RATIOS AS A PERCENTAGE OF LOANS TO CUSTOMERS						
Restructured loans / Loans to customers (gross)	2.0%	2.7%		1.7%	2.7%	
NPL > 90 days / Loans to customers (gross)	1.3%	1.4%		0.9%	1.0%	
NPE / Loans to customers (gross)	2.6%	3.3%		1.9%	2.6%	
NPE ratio - EBA (includes debt securities and off-balance exposures)	1.6%	2.0%		1.4%	1.8%	
COVERAGE BY IMPAIRMENTS						
Total impairment / NPL > 90 days	172.2%	187.3%		203.1%	223.9%	
Total impairment / NPE	86.8%	80.0%		95.5%	87.1%	
Impairments allocated to NPE / NPE	54.3%	53.8%		52.5%	55.1%	

Note: NPE include loans to customers only, as defined in the Glossary.

CUSTOMER FUNDS

On 30 September 2025, the consolidated total customer funds amounted to EUR 109,526 million, representing an increase of 8.6% (EUR +8,708 million) compared to the EUR 100,817 million obtained on the same date in the previous year, benefiting from the increases recorded in the activity in Portugal (EUR +4,408 million than on the same date in the previous year) and in the international activity (EUR +4,300 million than on the same date in the previous year). The evolution of total customer funds reflects the good performance of most items, with emphasis on the increase in deposits and other resources from customers (EUR +6,116 million compared to 30 September 2024) in balance sheet customers funds and in assets placed with customers (EUR +1,391 million compared to the same date of the previous year) in off-balance sheet customer funds.

Consolidated balance sheet customer funds amounted to EUR 89,823 million on 30 September 2025, showing an increase of EUR 6,298 million (+7.5%) compared to the EUR 83,525 million achieved at the

end of the first nine months of the previous year. This favourable evolution is due to the momentum recorded in the international activity (EUR +3,456 million compared to the same date in the previous year) and in the activity in Portugal (EUR +2,842 million compared to the same date in the previous year).

As of 30 September 2025, consolidated off-balance sheet customer funds, which include assets under management, assets placed with customers and insurance products (savings and investment), amounted to EUR 19,703 million, representing an increase of EUR 2,411 million compared to figure achieved in the same date in the prior year. Off-balance sheet customer funds recorded increases both in the activity in Portugal and in the international activity (EUR +1,566 million and EUR +844 million compared to the same date in the previous year, respectively).

In the activity in Portugal, total customer funds reached EUR 73,959 million on 30 September 2025, compared with the EUR 69,551 million recorded at the end of the first nine months of the previous year (+6.3%), with this evolution being mainly justified by the increase in deposits and other resources from customers in balance sheet customer funds and by the increase in assets placed with customers in off-balance sheet customer funds.

Balance sheet customer funds in the activity in Portugal reached EUR 57,585 million on 30 September 2025, compared with EUR 54,743 million recorded on the same date in the previous year, with this evolution being justified by the increase in deposits and other resources from customers (EUR +2,660 million compared to the end of the first nine months of the previous year).

Off-balance sheet customer funds in the activity in Portugal recorded an increase of EUR 1,566 million compared to the first nine months of the previous year, reaching EUR 16,374 million on 30 September 2025, driven by a more significant increase in assets placed with customers and by a less relevant increase in insurance products (savings and investment). In turn, assets under management remained unchanged.

In the international activity, total customer funds increased by EUR 4,300 million (+13.8%) compared to the EUR 31,266 million recorded on 30 September 2024, standing at EUR 35,566 million at the end of the first nine months of 2025. This increase was mainly driven by the good performance of the balance sheet customer funds due to the growth of deposits and other resources from customers and also by the favourable evolution of the off-balance sheet customer funds, mainly influenced by the more significant growth observed in assets under management. The aforementioned increase was driven by the growth in the Polish subsidiary, while the activity in the Mozambican subsidiary remained stable.

Balance sheet customer funds in the international activity, entirely comprised of deposits and other resources from customers, stood at EUR 32,238 million on 30 September 2025, recording an increase of EUR 3,456 million compared to the EUR 28,783 million posted at the end of the first nine months of 2024, benefiting primarily from the growth in volumes of resources in the Polish operation. In the subsidiary in Mozambique, the resources increase in local currency was offset by the effect of the devaluation of the Metical, with balance customer funds in euros remaining steady compared to the same date of the previous year.

Off-balance sheet customer funds in the international activity, arising exclusively from the activity in the Polish subsidiary, increased by EUR 844 million compared to the end of the first nine months of the previous year, standing at EUR 3,328 million on 30 September 2025, driven mainly by the increase recorded in assets under management and also by a smaller increase in assets placed with customers. Conversely, there was a reduction, although less significant, in insurance products (savings and investment).

In consolidated terms, as of 30 September 2025, balance sheet customer funds represented 82.0% of total customer funds (slightly below the 82.8% recorded on the same date of the previous year), with deposits and other resources from customers representing 80.7% of total customer funds (slightly below the 81.6% observed on the same date of the previous year).

The loans to deposit ratio, which results from the quotient between loans to customers (net) and deposits and other resources from customers, stood at 68.0% on 30 September 2025 (below the 69.4% ratio observed on the same date of the previous year). The aforementioned indicator considering

balance sheet customer funds stood at 66.9% (below the 68.4% ratio observed on the same date of the previous year).

TOTAL CUSTOMER FUNDS

	million EUR		
	30 Sep. 25	30 Sep. 24 (restated)	Chg. 25/24
BALANCE SHEET CUSTOMER FUNDS	89,823	83,525	7.5%
Deposits and other resources from customers	88,355	82,239	7.4%
Debt securities	1,468	1,286	14.2%
OFF-BALANCE SHEET CUSTOMER FUNDS	19,703	17,292	13.9%
Assets under management	6,762	6,095	11.0%
Assets placed with customers	8,138	6,748	20.6%
Insurance products (savings and investment)	4,802	4,449	7.9%
	109,526	100,817	8.6%
Of which:			
Activity in Portugal	73,959	69,551	6.3%
International activity	35,566	31,266	13.8%

SECURITIES PORTFOLIO

The securities portfolio, as defined in the Glossary, amounted to EUR 37,863 million as of 30 September 2025, representing an increase of 20.1% compared to the EUR 31,535 million recorded on the same date in the previous year, representing 34.8% of total assets at the end of the first nine months of 2025 (31.5% at the end of the first nine months of 2024). This increase is mainly explained by the liquidity arising from the growth of balance sheet customer funds.

The portfolio allocated to the activity in Portugal totalled EUR 21,338 million on 30 September 2025, growing by EUR 1,733 million compared to the EUR 19,605 million recorded at the end of the first nine months of 2024. This increase is explained by the investment in the sovereign debt portfolio of the European Union, Spain and Italy, partially offset by the reduction of the Portuguese, German and French sovereign debt.

The securities portfolio allocated to the international activity stood at EUR 16,525 million on 30 September 2025, representing an increase of EUR 4,595 million compared to the EUR 11,930 million at the end of the first nine months of the previous year. This growth was primarily driven by the activity in the Polish subsidiary, following the investment in local public debt and to a lesser extent also in public debt from other euro zone countries.

Business Areas

Activity per Segments

Millennium bcp conducts a wide range of banking activities and financial services in Portugal and abroad, with special focus on Retail Banking, Companies Banking and Private Banking business.

BUSINESS SEGMENT	PERIMETER
Retail Banking	Retail Network of Millennium bcp (Portugal) Retail Recovery Division Banco ActivoBank
Companies and Corporate	Companies and Corporate Network of Millennium bcp (Portugal) Specialised Recovery Division Large Corporate Network of Millennium bcp (Portugal) Investment Banking (*) Interfundos (*) Specialized Credit and Real Estate Division (*) Treasury and Markets International Division (*)
Private Banking	Private Banking Network of Millennium bcp (Portugal)
International Business	Bank Millennium (Poland) (**) Millennium bim (Mozambique) Banco Millennium Atlântico (Angola) (***)
Other	Comprises the activity carried out by Banco Comercial Português, S.A. not included in the commercial business in Portugal which corresponds to the segments identified above, including the activity carried out by Macao branch. Also includes all other business and unallocated values in particular centralized management of financial investments, corporate activities and insurance activity.

(*) Units all together that serve mainly customers in the Companies & Corporate segment, but also customers in other segments, in which the corresponding income is recognized. The operating costs of those units are attributed to the Other segment.

(**) Entity segmented into Retail Banking, Companies and Corporate, and Others, as referenced in note 49 of the Notes to Consolidated Accounts section of this report.

(***) Consolidated by the equity method.

The figures reported for each segment resulted from aggregating the subsidiaries and business units integrated in each segment. For the business units in Portugal, the aggregation process reflects the impact from capital allocation and balancing process in the balance sheet and income statement, based on average figures. The balance sheet headings for each business unit in Portugal were re-calculated, considering the replacement of the equity book values by the amounts assigned through the allocation process, based on the regulatory solvency criteria.

Considering that the process of capital allocation complies with the regulatory criteria of solvency in force, from 1 January 2025, the risk weighted assets, and consequently the capital allocated to the business segments, are determined in accordance with the Basel IV framework, pursuant to the CRD VI/CRR3 (in 2024, they are determined in accordance with the Basel III framework, pursuant to the CRD V/CRR2). The capital allocated to each segment resulted from the application of a target capital ratio to the risk weighted exposures managed by each segment, reflecting the application of the Basel IV methodology in 2025 (Basel III in 2024). The introduction of CRR3 led to a significant increase

in risk weighted assets to cover operational risk. Each operation is balanced through internal transfers of funds, with impact on the net interest income and income taxes of each segment, hence with no impact in consolidated accounts.

Commissions and other net income, as well as operating costs calculated for each business area, are based on the amounts accounted for directly in the respective cost centres, on the one hand, and the amounts resulting from internal processes for allocating revenues and costs, for another. In this case, the allocation is based on the application of pre-defined criteria and subject to periodic review, related to the level of activity of each business area.

Each segment's income includes the non-controlling interests, when applicable. Therefore, the values of net income presented incorporate the individual net income of the business units, regardless of the percentage stake held by the Group, and the impacts of the transfers of funds described above.

Whenever applicable, historical figures may reflect specific restatements carried out to ensure the comparability of information across periods.

The information presented below for the individually more relevant business areas in Portugal and aggregately for the international activity was based on the financial statements prepared in accordance with IFRS and on the organization of the Group's business areas as at 30 September 2025.

RETAIL

million EUR

RETAIL BANKING in Portugal	Sep 30, 2025	Sep 30, 2024	Chg. 25/24
PROFIT AND LOSS ACCOUNT			
Net interest income	813	871	-6.7%
Other net income	386	357	8.0%
	1,199	1,228	-2.4%
Operating costs	244	244	—%
Impairment and provision	60	39	53.6%
Income before tax	895	945	-5.3%
Income taxes	271	296	-8.4%
Income after tax	624	649	-4.0%
SUMMARY OF INDICATORS			
Allocated capital	1,004	976	2.9%
Return on allocated capital	83.0%	88.9%	
Risk weighted assets	7,880	7,426	6.1%
Cost to income ratio	20.3%	19.8%	
Loans to Customers (net of impairment charges)	29,036	26,337	10.2%
Balance sheet Customer funds	42,979	39,455	8.9%

Notes:

Allocated capital, Loans to customers (net of recoveries) and Balance sheet Customer funds figures based on average balance.

Financial performance

As at 30 September 2025, income after tax from Retail Banking segment of Millennium bcp in Portugal totalled EUR 624 million, showing a 4.0% decrease compared to EUR 649 million in the same period of 2024, reflecting a lower net interest income. Regarding the evolution of the main income statement headings, the following aspects should be highlighted:

- Net interest income reached EUR 813 million as at 30 September 2025, reflecting a decrease of 6.7% compared to the EUR 871 million recorded in the same period of 2024. This decrease was mainly driven by the lower contribution of customer deposits, penalized by lower market interest rates, only partly offset by the impact of the loan portfolio growth.
- Other net income reached EUR 386 million as at 30 September 2025, increasing 8.0% compared with the same period of 2024. The performance reflects essentially the higher level of commissions, largely driven by bancassurance.
- Operating costs remained in line with the amounts recognized as at 30 September 2024.
- Impairment charges amounted to EUR 60 million at the end of September 2025, representing an increase from the amount of EUR 39 million recorded in the same period of the previous year, mainly reflecting an increase in the coverage of exposures from customers under recovery.
- In September 2025, loans to customers (net) totalled EUR 29,036 million, increasing 10.2% from September 2024 (EUR 26,337 million), mainly from the increase in mortgage loans, while balance sheet customer funds increased by 8.9% in the same period, amounting to EUR 42,979 million in September 2025 (EUR 39,455 million in September of the previous year), mainly explained by the increase in customer deposits.

COMPANIES AND CORPORATE

million EUR

COMPANIES AND CORPORATE in Portugal	Sep 30, 2025	Sep 30, 2024	Chg. 25/24
PROFIT AND LOSS ACCOUNT			
Net interest income	197	207	-4.9%
Other net income	116	119	-2.7%
	313	326	-4.1%
Operating costs	52	46	12.9%
Impairment and provision	36	104	-66.0%
Income before tax	225	176	28.4%
Income taxes	68	55	24.3%
Income after tax	157	121	30.2%
SUMMARY OF INDICATORS			
Allocated capital	1,353	1,413	-4.3%
Return on allocated capital	15.5%	11.4%	
Risk weighted assets	10,636	11,077	-4.0%
Cost to income ratio	16.6%	14.1%	
Loans to Customers (net of impairment charges)	11,660	11,517	1.2%
Balance sheet Customer funds	9,271	9,450	-1.9%

Notes:

Allocated capital, Loans to customers (net of recoveries) and Balance sheet Customer funds figures based on average balance.

Financial performance

Companies and Corporate segment in Portugal income after tax of EUR 157 million in September 2025 compares favourably to the EUR 121 million presented in September 2024. This evolution results mostly from a lower level of impairment and provision. As at 30 September 2025 the performance of this segment is explained by the following factors:

- Net interest income stood at EUR 197 million as at 30 September 2025, 4.9% below the amount attained as at 30 September 2024 (EUR 207 million). This performance was mainly driven by a reduction in the contribution from deposits, stemming from a lower volume and by the decrease of income arising from the internal placements of the excess liquidity, although partially mitigated by the growth recorded in loans to customers.
- Other net income reached EUR 116 million as at 30 September 2025, being 2.7% lower compared to the amount achieved in the same period of 2024, reflecting mostly the evolution of commissions.
- Operating costs totalled EUR 52 million by the end of September 2025, 12.9% above the overall amount of costs recorded in the same period of the previous year.
- Impairment charges stood at EUR 36 million as at 30 September 2025, comparing favourably to EUR 104 million as at 30 September 2024, reflecting a prudent risk management and the corresponding improvement in the credit portfolio's risk profile.
- In September 2025, loans to customers (net) totalled EUR 11,660 million, increasing 1.2% from September 2024 (EUR 11,517 million), in the context of the Recovery and Resilience Plan (RRP) execution, which has had a positive impact on the Portuguese business sector. However, this evolution continues to be influenced by the repayment program of Covid lines, as the Bank had an outsized market share in granting this financing. Balance sheet customer funds reached EUR 9,271 million, 1.9% below the amount recorded in September 2024, particularly from the reduction of the customer deposits base.

PRIVATE BANKING

million EUR

PRIVATE BANKING in Portugal

	Sep 30, 2025	Sep 30, 2024	Chg. 25/24
PROFIT AND LOSS ACCOUNT			
Net interest income	30	37	-17.1%
Other net income	32	26	18.4%
	62	63	-2.2%
Operating costs	12	12	1.5%
Impairment and provision	0	0	
Income before tax	50	51	-3.0%
Income taxes	15	16	-6.1%
Income after tax	35	35	
SUMMARY OF INDICATORS			
Allocated capital	26	26	-1.9%
Return on allocated capital	>100%	>100%	
Risk weighted assets	203	204	-0.5%
Cost to income ratio	19.2%	18.5%	
Loans to Customers (net of impairment charges)	394	351	12.3%
Balance sheet Customer funds	3,026	3,128	-3.3%

Notes:

Allocated capital, Loans to customers (net of recoveries) and Balance sheet Customer funds figures based on average balance.

Financial performance

Income after tax from Private Banking business in Portugal totalled EUR 35 million as at 30 September 2025, in line with the net profit reached as at 30 September 2024. Considering the performance of the main items of the income statement, the following should be highlighted:

- Net operating revenues stood at EUR 62 million as at 30 September 2025, 2.2% below the amount recorded in September 2024, driven by the decrease in net interest income, which more than offset the increase recorded in other net income. Net interest income totalled EUR 30 million as at 30 September 2025, comparing unfavourably to EUR 37 million reached in September 2024, reflecting the impact of customer deposits, resulting in lower income arising from the internal placement of the excess liquidity. Other net income amounted to EUR 32 million as at 30 September 2025, reflecting an increase of 18.4% compared to

the amount shown in the same period of the previous year, reflecting higher commissions from distribution of third-party investment funds, as a result of the customer funds diversification.

- Operating costs amounted to EUR 12 million, 1.5% above the amounts recognized as at September 2024.
- Impairment and provision charges had a minimal impact on the income statement in both periods.
- Loans to customers (net) amounted to EUR 394 million in September 2025, increasing 12.3% when compared to the figures accounted in September of the previous year, while balance sheet customer funds amounted to EUR 3,026 million in September 2025, 3.3% below the level achieved in September 2024, mainly due to greater allocation of investments to off-balance sheet products.

FOREIGN BUSINESS AND OTHERS

million EUR

Poland	Sep 30, 2025	Sep 30, 2024	Chg. 25/24
PROFIT AND LOSS ACCOUNT			
Net interest income	1,013	956	5.9 %
Other net income	107	55	95.0 %
	1,120	1,011	10.8 %
Operating costs	411	366	12.5 %
Result on modification	-5	-62	-91.4 %
Impairment and provision	420	452	-7.4 %
Income before tax	284	131	117.2 %
Income taxes	82	4	>200%
Income after income tax	202	127	59.0 %
BALANCE SHEET			
Loans to Customers (net of impairment charges)	17,670	17,641	0.2%
Balance sheet Customer funds	30,069	26,619	13.0%

Note: The accounts presented are in accordance with the Consolidated Accounts of the Group, and may differ from the accounts disclosed locally.

million EUR

Mozambique	Sep 30, 2025	Sep 30, 2024	Chg. 25/24
PROFIT AND LOSS ACCOUNT			
Net interest income	159	151	5.1%
Other net income	41	45	-8.6%
	200	196	2.0%
Operating costs	103	97	5.5%
Impairment and provision	53	12	>200%
Income before tax	44	87	-48.6%
Income taxes	19	23	-18.0%
Income after income tax	25	64	-60.0%
BALANCE SHEET			
Loans to Customers (net of impairment charges)	626	637	-1.7%
Balance sheet Customer funds	2,170	2,164	0.3%

Note: The accounts presented are in accordance with the Consolidated Accounts of the Group, and may differ from the accounts disclosed locally.

million EUR

INTERNATIONAL BUSINESS	Sep 30, 2025	Sep 30, 2024	Chg. 25/24
PROFIT AND LOSS ACCOUNT			
Net interest income	1,172	1,107	5.8 %
Other net income (*)	151	102	48.8 %
	1,323	1,209	9.4 %
Operating costs	515	463	11.0 %
Result on modification	-5	-62	-91.4 %
Impairment and provision	471	464	1.6 %
Income before tax	332	220	51.4 %
Income taxes	101	27	>200%
Income after income tax	231	193	19.8 %
SUMMARY OF INDICATORS			
Allocated capital (**)	2,499	2,230	12.1 %
Return on allocated capital	12.3%	11.5%	
Risk weighted assets	16,779	15,407	8.9%
Cost to income ratio	38.9%	38.3%	
Loans to Customers (net of impairment charges)	18,297	18,279	0.1%
Balance sheet Customer funds	32,238	28,783	12.0%

(*) Includes equity accounted earnings related to the investment in Banco Millennium Atlântico.

(**) Allocated capital figures based on average balance.

Financial performance

Income after tax from International Business, computed in accordance with the geographic perspective, was EUR 231 million as at 30 September 2025, comparing favourably with an amount of EUR 193 million achieved by the end of September 2024. This favourable evolution of 19.8% was primarily driven by the positive performance of core income, particularly in net interest income, and by the absence of costs associated to the moratorium program (credit holidays), which had impacted 2024 results, factors partly offset by higher operating costs and higher costs incurred with mandatory contributions to which the Polish subsidiary is subject.

Considering the different items of the income statement, the performance of International Business can be analysed as follows:

- Net interest income stood at EUR 1,172 million as at 30 September 2025, which compares to EUR 1,107 million recorded on 30 September 2024. Excluding the impact arising from foreign exchange effects, it would have increased by 4.7%, reflecting the strong performance of the Polish subsidiary, driven by customer deposits growth, and of the Mozambican subsidiary, which benefited from the reduction in the local requirement for non-remunerated cash reserves held with the

central bank, as well as from lower interest paid on customer deposits.

- Other net income attained EUR 151 million as at 30 September 2025, increasing 48.8% when compared to the EUR 102 million recorded in the same period of the previous year, determined by the performance of the Polish subsidiary, due to the positive effect related to the foreign exchange mortgage loan portfolio, reflecting a reduction in costs incurred in converting mortgage loans granted in Swiss francs, following the agreements with customers holding these loans, and lower legal expenses related to this mortgage portfolio. However, this impact was partly offset by higher costs associated with mandatory contributions, explained by the conclusion of the Polish subsidiary's Recovery Plan in June 2024, during which no special tax on the banking sector was paid.
- Operating costs amounted to EUR 515 million as at 30 September 2025, 11.0% up from the end of September 2024. Excluding foreign exchange effects, operating costs would have increased 10.2%, mainly reflecting the impact of the Polish subsidiary, due to the strong pressure on basic wages, influenced by the current scenario of the Polish labour market, with very low unemployment rates. In the Mozambican subsidiary, although the increase was less pronounced, there was an

increase in headcount and across the main cost categories.

- Results on modification totalled a negative amount of EUR 5 million by the end of September of 2025, which compares with an also negative amount of EUR 62 million recorded in the same period of the previous year. This performance reflects the recognition of costs arising from the moratorium program (credit holidays) booked in 2024. In both periods, this item includes the amounts associated with contractual modifications, namely those negotiated with customers with foreign exchange mortgage loans, which have also shown a favourable evolution compared to the previous year.
- Impairment and provision charges at the end of September 2025 presented a 1.6% increase compared to the figures reported by the end of September 2024. This increase mainly reflected the impact of the Mozambican subsidiary, due to the recognition of impairment charges related with that

country's sovereign exposure, partly offset by the decrease observed in the Polish subsidiary, driven by a lower level of impairment charges, following the sale of a non-performing portfolio during the current year, and by lower provision charges booked to address the foreign exchange mortgage legal risk.

- Loans to customers (net) stood at EUR 18,297 million in September 2025, remaining in line with the amount attained in September 2024. Excluding foreign exchange effects, the loan portfolio also remained in line with the figure recorded in the same period of the previous year. The International Business balance sheet customer funds increased 12.0% from EUR 28,783 million reported in September 2024 to EUR 32,238 million in September 2025. Excluding the foreign exchange effects, balance sheet customer funds also increased 12.0%, mainly driven by the performance of the subsidiary in Poland.

Funding and Liquidity

Between September 2024 and September 2025, the Group's liquidity position was strengthened as a result of, among other factors, customer balance sheet resources growing faster than the loan portfolio – primarily driven by the significant increase in customer deposits at Bank Millennium – debt issuance carried out by the Polish bank under the MREL (Minimum Requirements for Own Funds and Eligible Liabilities) framework and the covered bond programme, as well as the favourable contribution from the Group's profitability. This evolution had a positive impact on regulatory liquidity indicators.

As of 30 September 2025, with respect to short-term liquidity, the Liquidity Coverage Ratio (LCR) stood at 321% on a consolidated basis, well above the 314% recorded a year earlier, thereby ensuring an increasing comfort buffer relative to the minimum regulatory requirement of 100%.

From a structural liquidity perspective, the Group continued to reinforce its stable funding base, supported by a high share of customer deposits – particularly from the retail segment – complemented by medium and long-term funding instruments, namely issuances under the MREL requirements and Bank Millennium's covered bond programme. Consequently, as of 30 September 2025, the Net Stable Funding Ratio (NSFR) reached 180%, above the 175% recorded one year earlier, ensuring a substantial buffer above the 100% regulatory minimum. The loan-to-deposit ratio stood at 68% at the end of September 2025, compared to 69% in the same date in the previous year, reflecting prudent balance sheet management while also incorporating the recovery in lending activity in Portugal since early 2025.

In October 2024 and in line with its strategy of extending its credit curve in the market and maintaining a robust buffer over its MREL requirements, BCP executed a EUR 500 million senior preferred debt issuance, aimed at refinancing, under significantly more favourable pricing conditions, a EUR 350 million issuance carried out in 2022.

During the first half of the year, in compliance with its 2025 Funding Plan, BCP tapped the debt capital markets on two occasions: in March, with a EUR 500 million subordinated bond (Tier 2) issuance, an operation intended to refinance, in advance and at a materially tighter spread, a EUR 450 million issuance, as well as to offset the reduction in eligible Tier 2 stock resulting from the partial repurchase of another issue executed through a simultaneous liability management transaction; and in June, with a new EUR 500 million senior preferred debt issue, MREL-eligible, which was designed to ensure the early refinancing, as announced to the market at the end of September and subsequently completed in October, of an issue of the same size and instrument.

As of 30 September 2025, the liquidity buffer available with the ECB amounted to EUR 30.7 billion, representing an increase of EUR 1.3 billion versus September 2024, supported, among other factors, by profitability in the Portuguese operation and by the higher outstanding balance of debt instruments.

Over the last twelve months, Bank Millennium further strengthened its liquidity position, primarily through the strong growth of its customer deposit base, but also via covered bond issuances, namely PLN 500 million in November 2024 and PLN 800 million in March 2025, bringing the outstanding balance of this instrument to PLN 1,600 million.

Millennium Bim also maintained a robust liquidity position throughout 2025, underpinned by a significant increase in local-currency deposits and the resulting improvement in the liquidity buffer held with its central bank. This evolution was further supported by the reduction in minimum reserve requirements, both in local and foreign currency, introduced by the country's central bank in the first quarter of 2025.

Capital

The estimated CET1 ratio as at 30 September 2025 stood at 16.1% phased-in and 15.9% fully implemented, reflecting a change of -39 and -58 basis points, respectively, compared to the 16.5% phased-in and fully implemented ratios reported in the same period of 2024, comfortably above the minimum regulatory ratios defined within the scope of SREP (Supervisory Review and Evaluation Process) for September 2025 (CET1 9.89%, T1 11.82% and Total 14.38%) and in line with the 2025-2028 strategic plan.

The organic growth of capital, driven by the solid performance of recurring activity in Portugal and by prudent and proactive capital management, more than offset the impacts related to the provisioning for legal risks associated with foreign-currency loans at Bank Millennium, while also accommodating the increase in shareholder remuneration, reflected in the deduction of 75% of the 2025 results, in accordance with the current distribution policy. The additional distribution of 2024 results through the approximately EUR 200 million share buyback programme, together with the increase in risk-weighted assets resulting from the introduction of CRR3 and from the expansion of exposure in Corporate activity in Portugal, explains the decrease recorded in solvency ratios.

The ratios for September 2025, including 25% of the unaudited accumulated net results for the first nine months of the year, are as follows:

SOLVABILITY RATIOS

(million EUR)

	30 Sep. 25			30 Sep. 24		
	FULLY	PHASED	PHASED *	FULLY	PHASED	PHASED *
OWN FUNDS						
Common Equity Tier 1 (CET1)	6,721	6,721	6,658	6,539	6,542	6,434
Tier 1	7,214	7,214	7,151	7,030	7,033	6,926
TOTAL CAPITAL	8,437	8,437	8,374	8,257	8,256	8,148
RISK WEIGHTED ASSETS						
	42,311	41,784	41,830	39,708	39,718	39,718
CAPITAL RATIOS (*)						
CET1	15.9%	16.1%	15.9%	16.5%	16.5%	16.2%
Tier 1	17.0%	17.3%	17.1%	17.7%	17.7%	17.4%
Total	19.9%	20.2%	20.0%	20.8%	20.8%	20.5%

(*) According to the transitional provisions in force, capital ratios, not including the unaudited positive 3rd quarter net income

Deliver More Value - Strategic Plan 2025-28

“Deliver more value 28” sets a new bar for Millennium bcp’s aspirations towards customers, people and shareholders. Millennium bcp is starting this cycle from a strengthened position that allows the Bank to confidently aim for a compelling profitability level (ROE >13.5%) and a material distribution to shareholders (up to 75%⁵), while preserving a robust capital position (>13.5% CET1).

The Strategic Cycle now ending consolidated an unrivaled path of transformation that led to early achievement of the ambitious financial targets set forth, cementing the group’s competitive position in its markets, across most segments, excelling in profitability (ROE of 15.3% in 2023) and balance sheet robustness (CET1 of 16.5%⁶ in 9M2024). Ultimately, these results are reflected in the upward trajectory in share price (+229%, September 2024 vs. December 2020) and investment grade ratings (3-4 notches since 2018). Millennium bcp has done so strengthening its leadership in customer centricity, while solidifying its technology foundations.

In Portugal, the bank was successful in significantly boosting revenues (+50% vs. 2021), exploring previous strides in technology to increase digital and mobile adoption. In Poland, the Bank completed the recovery plan and restored profitability, despite sizeable recognition of FX mortgage provisions, while maintaining a stable performance in Mozambique in a challenging environment.

Millennium bcp has consistently grown business volumes as a group (+4% CAGR since 2018) and in each business unit, with particular emphasis in Poland, notwithstanding the 65% reduction of NPEs since 2018. This evolution allowed Millennium bcp to consolidate a competitive position across most of the segments, in markets that offer a structural advantage in the upcoming cycle with GDP growth above EU-27 average, sizeable EU funding packages for Portugal and Poland, and substantial investments in large projects for Mozambique.

Looking to the future, the Bank is well-positioned to navigate 3 main trends: (i) the likely downward trajectory of interest rates and its implications to profitability, (ii) the evolving customer behaviour with increased demand for innovation and personalization in the rise of AI, and (iii) the growing cybersecurity risks with increasing sophistication of attacks and an evolving regulatory context (e.g., DORA).

In this context, Millennium bcp is launching a new Strategic Plan for 2028, “Deliver more value 28”. In this plan, the Bank aspires to deliver more value to all stakeholders: for customers with a leading position in experience across markets, for talent with a satisfaction of >75/100 and >25% share of people promoted per year, and for shareholders with tangible returns and distribution. This will require an evolution of priorities (i) seeking growth options in attractive value pools with right-to-win, increasing portfolio balance towards the SME segment, (ii) innovating selectively in adjacencies, and (iii) strengthening credit risk capabilities.

In Portugal, Millennium bcp aspires to be the relationship bank with the best experience, human and digital enabled, for families and companies, ambitioning to capture 150-200k new active customers and +€4bn credit to companies (stock) by 2028. ActivoBank aims to lead customer acquisition in A/B digital first arena, with distinctive digital daily banking and value for money proposition, reaching 700k active customers in 2028.

In Poland, Bank Millennium aims to be the reference bank in acquisition and development of primary relationships with SMEs and individuals, embracing innovation and delivering top-quality services, reaching 3.7mn active customers, growing corporate lending stock at 14% p.a., and increasing the share of primary retail clients to 70%.

In Mozambique, Millennium bim will be focused on reinforcing its position as the main bank for families and companies and the reference bank for international investors in Mozambique’s economy, with strong risk controls, targeting 1.7mn active customers and circa of 20% market share in lending to companies and individuals.

These priorities will enable Millennium bcp to deliver more value, visible in the main targets set for 2028. As a group, the bank aspires to deliver a healthy organic growth, achieving business volumes in excess of €190bn, more than 8mn active customers of which mobile more than 80%, maintain an execution discipline

⁵ Of cumulative net income of €4.0-4.5bn in 2025-28 subject to supervisory approval and achievement of Plan’s relevant capital and business targets in Portugal and in the international area and fulfillment of CET1 target. Including payout and share buyback, 2025 through 2028.

⁶ Official ratio, without the Q3’24 net income, of 16.2%.

reflected in a cost-to-income below 40% and cost of risk of below 50bps, reinforcing the ESG commitment aiming for a top quartile position in S&P Global CSA rating, ultimately achieving returns with an RoE above 13.5%, keeping a sizeable capital buffer with a CET1 ratio of above 13.5% and shareholder distribution of up to 75%⁷ of the cumulative net income of €4.0-4.5bn in 2025-28.

Deliver more value

Main targets for strategic cycle 2025-2028

	Metrics	9M25	2028
Healthy organic growth	Business volumes Portugal	171€bn 117€bn	> 190€bn > 120€bn
	Number of customers Portugal	7.2mn 2.9mn	> 8mn > 3mn
	Mobile customers Portugal	74% 66%	>80% > 75%
Execution discipline	Cost-to-income Portugal	37% 34%	< 40% < 37%
	Cost of risk Portugal	31 bp 33 bp	< 50 bps < 45 bps
ESG commitment	S&P Global CSA (percentile)	Top quartile	Top quartile
Robust capital	CET1 ratio	15.9%¹	> 13.5%
Superior returns	ROE	14.6%	> 13.5%
	Shareholder distribution	2024 activity 72% ³	Up to 75% of cumulative net income of 4.0-4.5€bn in 2025-2028 ² subject to supervisory approval and achievement of Plan's relevant capital & business targets in Portugal and in the international area and fulfillment of CET1 target

¹ Fully implemented estimated ratio (September 2025) including 25% of the unaudited net income of 9M25.

² Including payout and share buyback, from 2025 through 2028.

³ Including a 50% dividend payout of 2024 earnings and the share buyback programme of 200 million euros, completed during 2025.

⁷ Subject to supervisory approval and achievement of Plan's relevant capital and business targets in Portugal and in the international area and fulfillment of CET1 target. Including payout and share buyback, 2025 through 2028.

Consolidated financial statements

CONSOLIDATED INDICATORS, ACTIVITY IN PORTUGAL AND INTERNATIONAL ACTIVITY

	million EUR								
	Group			Activity in Portugal			International activity		
	Sep. 25	Sep. 24 (restated)	Chg. 25/24	Sep. 25	Sep. 24 (restated)	Chg. 25/24	Sep. 25	Sep. 24 (restated)	Chg. 25/24
INCOME STATEMENT									
Net interest income	2,166.6	2,110.8	2.6 %	994.7	1,003.4	(0.9 %)	1,171.9	1,107.3	5.8 %
Dividends from equity instruments	0.8	0.8	(2.3 %)	0.0	0.0	0.0 %	0.8	0.8	(2.3 %)
Net fees and commissions income	628.8	604.6	4.0 %	465.5	437.7	6.3 %	163.3	166.9	(2.2 %)
Net trading income	80.7	29.3	175.8 %	10.8	28.4	(61.9 %)	69.9	0.9	>200%
Other net operating income	(96.6)	(98.0)	1.4 %	(9.6)	(27.7)	65.4 %	(87.0)	(70.3)	(23.8 %)
Equity accounted earnings	44.6	43.8	1.9 %	40.2	40.3	(0.4 %)	4.4	3.4	29.3 %
Net operating revenues	2,824.9	2,691.3	5.0 %	1,501.6	1,482.2	1.3 %	1,323.2	1,209.1	9.4 %
Staff costs	575.3	522.7	10.1 %	295.3	277.5	6.4 %	280.0	245.1	14.3 %
Other administrative costs	341.6	315.7	8.2 %	161.6	150.0	7.8 %	180.0	165.8	8.6 %
Amortisation and depreciation	115.5	107.3	7.6 %	61.0	54.8	11.4 %	54.5	52.6	3.7 %
Operating costs	1,032.5	945.7	9.2 %	517.9	482.3	7.4 %	514.6	463.4	11.0 %
Operating costs excluding specific items	1,029.3	943.0	9.2 %	514.7	479.6	7.3 %	514.6	463.4	11.0 %
Profit before impairment and provisions	1,792.4	1,745.6	2.7 %	983.7	1,000.0	(1.6 %)	808.6	745.6	8.5 %
Results on modification	(5.4)	(62.4)	91.4 %	0.0	0.0	0.0 %	(5.4)	(62.4)	91.4 %
Loan impairments (net of recoveries)	141.0	167.3	(15.7 %)	103.9	98.3	5.7 %	37.1	69.0	(46.2 %)
Other impairment and provisions	444.2	460.1	(3.4 %)	10.2	65.2	(84.3 %)	434.0	394.8	9.9 %
Profit before income tax	1,201.7	1,055.8	13.8 %	869.6	836.4	4.0 %	332.1	219.4	51.4 %
Income tax	317.1	262.8	20.7 %	215.7	235.8	(8.5 %)	101.4	27.1	>200%
Current	77.9	105.1	(25.9 %)	6.5	10.4	(37.4 %)	71.4	94.8	(24.6 %)
Deferred	239.2	157.7	51.7 %	209.2	225.4	(7.2 %)	30.0	(67.7)	144.2 %
Net income after income tax from continuing operations	884.6	793.0	11.6 %	653.9	600.6	8.9 %	230.7	192.3	20.0 %
Net income from discontinued operations	0.0	0.3	(100.0 %)	0.0	0.0	0.0 %	0.0	0.3	(100.0 %)
Non-controlling interests	108.7	79.2	37.2 %	(0.6)	(5.4)	89.2 %	109.3	84.6	29.2 %
Net income	775.9	714.1	8.7 %	654.5	606.0	8.0 %	121.5	108.1	12.4 %
BALANCE SHEET AND ACTIVITY INDICATORS									
Total assets	108,937	100,226	8.7 %	70,261	65,699	6.9 %	38,676	34,527	12.0 %
Total customer funds	109,526	100,817	8.6 %	73,959	69,551	6.3 %	35,566	31,266	13.8 %
Balance sheet customer funds	89,823	83,525	7.5 %	57,585	54,743	5.2 %	32,238	28,783	12.0 %
Deposits and other resources from customers	88,355	82,239	7.4 %	56,117	53,457	5.0 %	32,238	28,783	12.0 %
Debt securities	1,468	1,286	14.2 %	1,468	1,286	14.2 %	0	0	0.0 %
Off-balance sheet customer funds	19,703	17,292	13.9 %	16,374	14,808	10.6 %	3,328	2,484	34.0 %
Assets under management	6,762	6,095	11.0 %	4,417	4,416	0.0 %	2,346	1,679	39.7 %
Assets placed with customers	8,138	6,748	20.6 %	7,341	6,193	18.5 %	798	554	43.9 %
Insurance products (savings and investment)	4,802	4,449	7.9 %	4,617	4,199	10.0 %	185	250	(26.2 %)
Loans to customers (gross)	61,496	58,641	4.9 %	42,579	39,725	7.2 %	18,917	18,915	0.0 %
Individuals	37,389	35,971	3.9 %	23,743	21,740	9.2 %	13,646	14,231	(4.1 %)
Mortgage	29,644	28,604	3.6 %	21,103	19,238	9.7 %	8,541	9,366	(8.8 %)
Personal Loans	7,745	7,367	5.1 %	2,640	2,502	5.5 %	5,105	4,865	4.9 %
Companies	24,107	22,670	6.3 %	18,836	17,985	4.7 %	5,271	4,684	12.5 %
CREDIT QUALITY									
Total impairment (balance sheet)	1,387	1,547	(10.3 %)	767	910	(15.8 %)	620	637	(2.6 %)
Total impairment (balance sheet) / Loans to customers	2.3 %	2.6 %		1.8 %	2.3 %		3.3 %	3.4 %	
NPE (Loans to customers)	1,601	1,933	(17.2 %)	803	1,045	(23.2 %)	798	888	(10.1 %)
NPE / Loans to customers	2.6 %	3.3 %		1.9 %	2.6 %		4.2 %	4.7 %	
Total impairment (balance sheet) / NPE	86.6 %	80.0 %		95.5 %	87.1 %		77.7 %	71.7 %	
Restructured loans	1,240	1,609	(22.9 %)	727	1,056	(31.2 %)	514	553	(7.1 %)
Restructured loans / Loans to customers	2.0 %	2.7 %		1.7 %	2.7 %		2.7 %	2.9 %	
Cost of risk (net of recoveries, in b.p.)	31	38		33	33		26	49	

BANCO COMERCIAL PORTUGUÊS

INTERIM CONDENSED CONSOLIDATED INCOME STATEMENT FOR THE NINE MONTHS PERIODS ENDED 30 SEPTEMBER 2025 AND 2024

	(Thousands of euros)	
	30 September 2025	30 September 2024
Interest and similar income	3,300,579	3,558,274
Interest and similar expense	(1,133,977)	(1,447,511)
NET INTEREST INCOME	2,166,602	2,110,763
Dividends from equity instruments	803	822
Net fees and commissions income	628,781	601,769
Gains/(losses) on financial operations at fair value through profit or loss	65,877	(17,626)
Foreign exchange gains/(losses)	15,291	7,673
Gains/(losses) on hedge accounting	2,523	4,283
Gains/(losses) arising from derecognition of financial assets and liabilities not measured at fair value through profit or loss	(3,032)	34,921
Other operating income/(expenses)	(127,404)	(111,677)
TOTAL OPERATING INCOME	2,749,441	2,630,928
Staff costs	575,349	522,655
Other administrative costs	341,636	316,610
Amortisations and depreciations	115,531	107,335
TOTAL OPERATING EXPENSES	1,032,516	946,600
NET OPERATING INCOME BEFORE PROVISIONS AND IMPAIRMENTS	1,716,925	1,684,328
Results on modification	(5,394)	(62,440)
Impairment of financial assets at amortised cost	(161,066)	(166,068)
Impairment of financial assets at fair value through other comprehensive income	1,094	(4,426)
Impairment of other assets	(16,235)	(30,435)
Other provisions	(409,043)	(426,441)
NET OPERATING INCOME	1,126,281	994,518
Share of profit of associates accounted for using the equity method	44,622	43,784
Gains/(losses) on disposal of subsidiaries and other assets	30,807	17,490
NET INCOME BEFORE INCOME TAXES	1,201,710	1,055,792
Income taxes		
Current	(77,920)	(105,138)
Deferred	(239,173)	(157,669)
NET INCOME AFTER INCOME TAXES FROM CONTINUING OPERATIONS	884,617	792,985
Net income from discontinued or discontinuing operations	—	322
NET INCOME AFTER INCOME TAXES	884,617	793,307
Net income for the period attributable to:		
Bank's Shareholders	775,915	714,097
Non-controlling interests	108,702	79,210
NET INCOME FOR THE PERIOD	884,617	793,307
Earnings per share (in Euros)		
Basic	0.067	0.061
Diluted	0.067	0.061

BANCO COMERCIAL PORTUGUÊS
INTERIM CONDENSED CONSOLIDATED BALANCE SHEET
AS AT 30 SEPTEMBER 2025 AND 31 DECEMBER 2024

	(Thousands of euros)	
	30 September 2025	31 December 2024
ASSETS		
Cash and deposits at Central Banks	3,940,899	5,589,030
Loans and advances to credit institutions repayable on demand	236,140	251,157
Financial assets at amortised cost		
Loans and advances to credit institutions	1,119,349	797,535
Loans and advances to customers	56,046,118	53,907,058
Debt securities	24,975,807	21,345,171
Financial assets at fair value through profit or loss		
Financial assets held for trading	1,385,568	1,763,402
Financial assets not held for trading mandatorily at fair value through profit or loss	340,229	355,211
Financial assets designated at fair value through profit or loss	37,397	33,894
Financial assets at fair value through other comprehensive income	15,572,034	12,898,966
Hedging derivatives	23,363	69,349
Investments in associates	435,833	429,423
Non-current assets held for sale	69,246	45,245
Investment property	14,404	24,183
Other tangible assets	571,795	619,146
Goodwill and intangible assets	297,037	275,970
Current tax assets	21,766	21,159
Deferred tax assets	1,873,215	2,253,457
Other assets	1,976,807	1,464,246
TOTAL ASSETS	108,937,007	102,143,602
LIABILITIES		
Financial liabilities at amortised cost		
Deposits from credit institutions and other funds	1,435,246	777,719
Deposits from customers and other funds	86,349,819	82,084,687
Non-subordinated debt securities issued	4,208,096	3,528,710
Subordinated debt	1,406,057	1,427,359
Financial liabilities at fair value through profit or loss		
Financial liabilities held for trading	264,820	179,627
Financial liabilities designated at fair value through profit or loss	3,473,260	3,248,857
Hedging derivatives	38,805	39,041
Provisions	1,247,496	1,085,858
Current tax liabilities	76,792	136,008
Deferred tax liabilities	7,381	7,434
Other liabilities	1,727,552	1,435,745
TOTAL LIABILITIES	100,235,324	93,951,045
EQUITY		
Share capital	3,000,000	3,000,000
Share premium	16,471	16,471
Other equity instruments	400,000	400,000
Legal and statutory reserves	464,659	384,402
Treasury shares	(200,000)	—
Reserves and retained earnings	3,038,288	2,387,592
Net income for the period attributable to Bank's Shareholders	775,915	906,378
Non-controlling interests	1,206,350	1,097,714
TOTAL EQUITY	8,701,683	8,192,557
TOTAL LIABILITIES AND EQUITY	108,937,007	102,143,602

Alternative performance measures

BCP Group prepares financial information in accordance with International Financial Reporting Standards (IFRS) endorsed by European Union. As a complement to that information, it uses a set of alternative performance measures that allow monitoring the evolution of its activity over time. Following the guidelines on Alternative Performance Measures issued by the European Securities and Markets Authority (ESMA) in October 2015 (ESMA/2015/1415), BCP Group presents some indicators related to the assessment of profitability and efficiency and the quality of the credit portfolio, among others, which are intended to facilitate an understanding of the evolution of the economic and financial position of the Group. The information presented in this context should not, under any circumstance, be construed as a substitute for financial information prepared in accordance with IFRS. It should also be noted that the definitions and concepts used for the calculation of these indicators may differ from those used by other entities in the determination of other similar measures and may therefore not be directly comparable. These indicators and their components are also described in more detail in the Glossary.

1) Loans to customers (net) / Balance sheet customer funds

Relevance of the indicator: the loans-to-deposits ratio is an indicator of structural liquidity that shows the Group's liquidity sourcing from its customers compared to its investment in customer lending activities.

	million EUR	
	30 Sep. 25	30 Sep. 24 restated
Loans to customers (net) (1)	60,109	57,094
Balance sheet customer funds (2)	89,823	83,525
(1) / (2)	66.9%	68.4%

2) Return on average assets (ROA)

Relevance of the indicator: allows measurement of the capacity of the Group to generate results with the volume of available assets.

	million EUR	
	9M25	9M24
Net income (1)	776	714
Non-controlling interests (2)	109	79
Average total assets (3)	105,041	98,427
[(1) + (2), annualised] / (3)	1.1%	1.1%

3) Return on average equity (ROE)

Relevance of the indicator: allows assessment of the capacity of the Group to remunerate its shareholders, assessing the level of profitability generated by the funds invested by the shareholders in the Group.

	million EUR	
	9M25	9M24
Net income (1)	776	714
Coupons on AT1 Instruments (2)	24	26
Average equity (3)	6,902	6,193
[(1)-(2), annualised] / (3)	14.6%	14.9%

4) Return on tangible equity (ROTE)

Relevance of the indicator: allows assessment of the capacity of the Group to remunerate its shareholders, excluding intangible items.

	million EUR	
	9M25	9M24
Net income (1)	776	714
Coupons on AT1 Instruments (2)	24	26
Goodwill impairment (3)	0	0
Adjusted net income (4)=[(1)-(2)+(3)]	752	689
Average equity excluding goodwill and intangible assets (5)	6,621	5,962
[(4), annualised] / (5)	15.2%	15.4%

5) Cost-to-income*

Relevance of the indicator: it allows for the monitoring of the level of efficiency of the Group (excluding specific items), evaluating the volume of operating costs to generate net operating revenues.

	million EUR	
	9M25	9M24 restated
Operating costs (1)	1,033	946
of which: specific items (2)	3	3
Net operating revenues (3)	2,825	2,691
of which: specific items (4)	—	—
[(1) - (2)] / [(3) - (4)]	36.4%	35.0%

* Excluding specific items. In the first nine months of 2025, specific items had a negative impact in the amount of EUR 3 million recognised as staff costs in the activity in Portugal; in the first nine months of 2024, specific items had also a negative impact in the amount of EUR 3 million also recognised as staff costs in the activity in Portugal.

6) Cost of risk, net of recoveries (expressed in basis points, annualised) *

Relevance of the indicator: allows assessment of the quality of the loan portfolio by evaluating the ratio between impairment charges recognised in the period (net of reversals and recoveries of credit and interest) and the stock of loans to customers at the end of that period.

	million EUR	
	9M25	9M24 restated
Loans to customers at amortised cost, before impairment (1)	61,382	58,637
Loan impairment charges (net of recoveries) (2)	141	167
[(2), annualised] / (1)	31	38

* In the first nine months of 2024, cost of risk excluding an impairment reversal occurred in the second quarter of 2024 stood at 49 b.p.

7) Non-performing exposures (NPE) / Loans to customers (gross)

Relevance of the indicator: allows the assessment of the level of credit risk to which the Group is exposed based on the proportion of the NPE loan portfolio in the loans-to-customers portfolio (gross).

	million EUR	
	30 Sep. 25	30 Sep. 24 restated
Non-Performing Exposures (Loans to customers) (1)	1,599	1,933
Loans to customers (gross) (2)	61,496	58,641
(1) / (2)	2.6%	3.3%

8) Total impairment / Non-performing exposures (NPE)

Relevance of the indicator: it allows the assessment of the relationship between the total balance sheet impairment recognised by the Group and the NPE loan portfolio.

	million EUR	
	30 Sep. 25	30 Sep. 24 restated
Non-Performing Exposures (Loans to customers) (1)	1,599	1,933
Total loan impairments (balance sheet) (2)	1,387	1,547
(2) / (1)	86.8%	80.0%

9) Impairments allocated to NPE / Non-performing exposures (NPE)

Relevance of the indicator: it allows the assessment of the relationship between the impairments allocated to NPE recognised by the Group and the NPE loan portfolio.

	million EUR	
	30 Sep. 25	30 Sep. 24 restated
Non-Performing Exposures (Loans to customers) (1)	1,599	1,933
Impairments allocated to NPE (balance sheet) (2)	868	1,040
(2) / (1)	54.3%	53.8%

Glossary

Assets placed with customers – amounts held by customers in the context of the placement of third-party products that contribute to the recognition of commissions.

Balance sheet customer funds – deposits and other resources from customers and debt securities placed with customers.

Business Volumes - corresponds to the sum of total customer funds and loans to customers (gross).

Commercial gap – loans to customers (gross) minus on-balance sheet customer funds.

Core income - net interest income plus net fees and commissions income.

Core operating profit - net interest income plus net fees and commissions income deducted from operating costs.

Cost of risk, net (expressed in basis points) - ratio of loan impairment (P&L) accounted in the period to loans to customers at amortised cost and debt instruments at amortised cost related to credit operations before impairment at the end of the period.

Cost-to-core income - operating costs divided by core income.

Cost-to-income – operating costs divided by net operating revenues.

Debt instruments – non-subordinated debt instruments at amortised cost and financial liabilities measured at fair value through profit or loss (debt securities and certificates).

Debt securities placed with customers - debt securities issued by the Bank and placed with customers.

Deposits and other resources from customers – deposits from customers and other funds at amortised cost and customer deposits at fair value through profit or loss.

Dividends from equity instruments - dividends received from investments classified as financial assets at fair value through other comprehensive income and from financial assets held for trading.

Equity accounted earnings - results appropriated by the Group related to the consolidation of entities where, despite having some influence, the Group does not control the financial and operational policies.

Insurance products – includes unit linked saving products and retirement saving plans (“PPR”, “PPE” and “PPR/E”).

Loan impairments (balance sheet) – balance sheet impairment related to loans to customers at amortised cost, balance sheet impairment associated with debt instruments at amortised cost related to credit operations and fair value adjustments related to loans to customers at fair value through profit or loss.

Loan impairments (P&L) – impairment (net of reversals and net of recoveries - principal and accrual) of financial assets at amortised cost for loans to customers and for debt instruments related to credit operations.

Loans to customers (gross) – loans to customers at amortised cost before impairment, debt instruments at amortised cost associated to credit operations before impairment and loans to customers at fair value through profit or loss before fair value adjustments.

Loans to customers (net) - loans to customers at amortised cost net of impairment, debt instruments at amortised cost associated to credit operations net of impairment and balance sheet amount of loans to customers at fair value through profit or loss.

Loan to Deposits ratio (LTD) (Instruction from Banco de Portugal no. 16/2004) – loans to customers (net) divided by deposits and other resources from customers.

Loan to value ratio (LTV) – mortgage amount divided by the appraised value of property.

Net commissions - net fees and commissions income.

Net interest margin (NIM) - net interest income for the period as a percentage of average interest earning assets.

Net operating revenues - net interest income, dividends from equity instruments, net commissions, net trading income, other net operating income and equity accounted earnings.

Net trading income – gains/(losses) on financial operations at fair value through profit or loss, foreign exchange gains/(losses), gains/(losses) on hedge accounting and gains/(losses) arising from derecognition of financial assets and liabilities not measured at fair value through profit or loss.

Non-performing exposures (NPE) – non-performing loans and advances to customers (includes loans to customers at amortised cost, loans to customers at fair value through profit or loss and, from 2023, debt instruments at amortised cost associated to credit operations before impairment) more than 90 days past-due or unlikely to be paid without collateral realisation, if they recognised as defaulted or impaired.

Non-performing loans (NPL) – overdue loans (includes loans to customers at amortised cost, loans to customers at fair value through profit or loss and, from 2023, debt instruments at amortised cost associated to credit operations before impairment) more than 90 days past due including the non-overdue remaining principal of loans.

Off-balance sheet customer funds – assets under management, assets placed with customers and insurance products (savings and investment) subscribed by customers.

Operating costs - staff costs, other administrative costs and amortisation and depreciation.

Other impairment and provisions – impairment (net of reversals) for loans and advances of credit institutions classified at amortised cost, impairment for financial assets (classified at fair value through other comprehensive income and at amortised cost not associated with credit operations), impairment for other assets, namely assets received as payment in kind, investments in associates and goodwill of subsidiaries and other provisions.

Other net income – dividends from equity instruments, net commissions, net trading income, other net operating income and equity accounted earnings.

Other net operating income – other operating income/(expenses) and gains/(losses) on disposal of subsidiaries and other assets.

Performing loans - loans to customers (gross) deducted from Non-performing exposures (NPE).

Profit before impairment and provisions – net operating revenues deducted from operating costs.

Return on average assets (Instruction from Banco de Portugal no. 16/2004) – net income (before tax and non-controlling interests) divided by the average total assets (weighted average of the average of monthly net assets in the period).

Return on average assets (ROA) – net income (before minority interests) divided by the average total assets (weighted average of the average of monthly net assets in the period).

Return on equity (Instruction from Banco de Portugal no. 16/2004) – net income (before tax and non-controlling interest) divided by the average equity (weighted average of the average of monthly equity in the period).

Return on equity (ROE) – net income (after minority interests) deducted from Coupons on ATI (if they exist), divided by the average equity (weighted average of the average of monthly equity in the period), with Equity = Equity - preference shares - other capital instruments, net of treasury shares of the same nature - non-controlling interests.

Return on tangible equity (ROTE) – net income (after minority interests) deducted from Coupons on ATI and from goodwill impairment (if they exist), divided by the average equity, deducted from goodwill and intangible assets (weighted average of the average of monthly equity in the period), with Equity = Equity - preference shares - other capital instruments, net of treasury shares of the same nature - non-controlling interests.

Securities portfolio - debt instruments at amortised cost not associated with credit operations (net of impairment), financial assets at fair value through profit or loss (excluding the ones related to loans to

customers and trading derivatives), financial assets at fair value through other comprehensive income and assets with repurchase agreement.

Spread - increase (in percentage points) to the index used by the Bank in loans granting or fund raising.

Total customer funds - balance sheet customer funds and off-balance sheet customer funds.

Accounts and Notes to the Interim Condensed Consolidated Accounts

INTERIM CONDENSED CONSOLIDATED INCOME STATEMENT FOR THE NINE MONTHS PERIODS ENDED 30 SEPTEMBER 2025 AND 2024

		(Thousands of euros)	
	Notes	30 September 2025	30 September 2024
Interest and similar income	2	3,300,579	3,558,274
Interest and similar expense	2	(1,133,977)	(1,447,511)
NET INTEREST INCOME		2,166,602	2,110,763
Dividends from equity instruments	3	803	822
Net fees and commissions income	4	628,781	601,769
Gains/(losses) on financial operations at fair value through profit or loss	5	65,877	(17,626)
Foreign exchange gains/(losses)	5	15,291	7,673
Gains/(losses) on hedge accounting	5	2,523	4,283
Gains/(losses) arising from derecognition of financial assets and liabilities not measured at fair value through profit or loss	5	(3,032)	34,921
Other operating income/(expenses)	6	(127,404)	(111,677)
TOTAL OPERATING INCOME		2,749,441	2,630,928
Staff costs	7	575,349	522,655
Other administrative costs	8	341,636	316,610
Amortisations and depreciations	9	115,531	107,335
TOTAL OPERATING EXPENSES		1,032,516	946,600
NET OPERATING INCOME BEFORE PROVISIONS AND IMPAIRMENTS		1,716,925	1,684,328
Results on modification	10	(5,394)	(62,440)
Impairment of financial assets at amortised cost	11	(161,066)	(166,068)
Impairment of financial assets at fair value through other comprehensive income	12	1,094	(4,426)
Impairment of other assets	13	(16,235)	(30,435)
Other provisions	14	(409,043)	(426,441)
NET OPERATING INCOME		1,126,281	994,518
Share of profit of associates accounted for using the equity method	15	44,622	43,784
Gains/(losses) on disposal of subsidiaries and other assets	16	30,807	17,490
NET INCOME BEFORE INCOME TAXES		1,201,710	1,055,792
Income taxes			
Current	31	(77,920)	(105,138)
Deferred	31	(239,173)	(157,669)
NET INCOME AFTER INCOME TAXES FROM CONTINUING OPERATIONS		884,617	792,985
Net income from discontinued or discontinuing operations	17	—	322
NET INCOME AFTER INCOME TAXES		884,617	793,307
Net income for the period attributable to:			
Bank's Shareholders		775,915	714,097
Non-controlling interests	45	108,702	79,210
NET INCOME FOR THE PERIOD		884,617	793,307
Earnings per share (in Euros)			
Basic	18	0.067	0.061
Diluted	18	0.067	0.061

CHIEF ACCOUNTANT

THE EXECUTIVE COMMITTEE

See accompanying notes to the interim condensed consolidated financial statements.

INTERIM CONDENSED CONSOLIDATED INCOME STATEMENT FOR THE THREE MONTHS PERIODS BETWEEN 1 JULY AND 30 SEPTEMBER 2025 AND 2024

	(Thousands of euros)	
	3 rd Quarter 2025	3 rd Quarter 2024
Interest and similar income	2,213,845	2,336,804
Interest and similar expense	(770,240)	(927,352)
NET INTEREST INCOME	1,443,605	1,409,452
Dividends from equity instruments	(18)	71
Net fees and commissions income	416,380	402,140
Gains/(losses) on financial operations at fair value through profit or loss	25,266	(2,166)
Foreign exchange gains/(losses)	28,017	(158)
Gains/(losses) on hedge accounting	4,517	(3,667)
Gains/(losses) arising from derecognition of financial assets and liabilities not measured at fair value through profit or loss	(3,455)	37,706
Other operating income/(losses)	(61,075)	(58,894)
TOTAL OPERATING INCOME	1,853,237	1,784,484
Staff costs	380,121	348,640
Other administrative costs	231,230	215,011
Amortisations and depreciations	77,340	71,579
TOTAL OPERATING EXPENSES	688,691	635,230
NET OPERATING INCOME BEFORE PROVISIONS AND IMPAIRMENTS	1,164,546	1,149,254
Results on modification	(4,453)	(8,704)
Impairment of financial assets at amortised cost	(128,315)	(142,005)
Impairment of financial assets at fair value through other comprehensive income	371	(759)
Impairment of other assets	(11,432)	(25,565)
Other provisions	(262,511)	(287,885)
NET OPERATING INCOME	758,206	684,336
Share of profit of associates accounted for using the equity method	27,065	22,640
Gains/(losses) on disposal of subsidiaries and other assets	5,760	3,716
NET INCOME BEFORE INCOME TAXES	791,031	710,692
Income taxes		
Current	(35,634)	(61,239)
Deferred	(175,297)	(141,927)
NET INCOME AFTER INCOME TAXES FROM CONTINUING OPERATIONS	580,100	507,526
Net income from discontinued or discontinuing operations	—	322
NET INCOME AFTER INCOME TAXES	580,100	507,848
Net income for the period attributable to:		
Bank's Shareholders	517,091	463,124
Non-controlling interests	63,009	44,724
NET INCOME FOR THE PERIOD	580,100	507,848

CHIEF ACCOUNTANT

THE EXECUTIVE COMMITTEE

See accompanying notes to the interim condensed consolidated financial statements.

INTERIM CONDENSED CONSOLIDATED STATEMENT OF COMPREHENSIVE INCOME FOR THE NINE MONTHS PERIODS ENDED 30 SEPTEMBER 2025 AND 2024

(Thousands of euros)

	30 September 2025		
	Attributable to		
	Continuing operations	Bank's Shareholders	Non-controlling interests
NET INCOME FOR THE PERIOD	884,617	775,915	108,702
ITEMS THAT MAY BE RECLASSIFIED TO THE INCOME STATEMENT (NOTE 44)			
Debt instruments at fair value through other comprehensive income			
Gains / (losses) for the period	76,442	53,754	22,688
Reclassification of gains/(losses) to profit or loss (note 5)	(6,335)	(6,284)	(51)
Cash flows hedging			
Gains / (losses) for the period	306,593	304,638	1,955
Other comprehensive income from investments in associates and others	14,274	14,271	3
Exchange differences arising on consolidation	(67,863)	(48,212)	(19,651)
IAS 29 application			
Effect on equity of Banco Millennium Atlântico, S.A.	1,417	1,417	—
Fiscal impact	(109,593)	(104,630)	(4,963)
	214,935	214,954	(19)
ITEMS THAT WILL NOT BE RECLASSIFIED TO THE INCOME STATEMENT			
Equity instruments at fair value through other comprehensive income			
Gains / (losses) for the period			
Subsidiaries	82	60	22
Associates	1,686	1,686	—
	1,768	1,746	22
Changes in own credit risk of financial liabilities at fair value through profit or loss (note 44)	1,900	1,900	—
Actuarial gains / (losses) for the period			
BCP Group Pension Fund	110,464	110,464	—
Pension Funds of foreign subsidiaries and associates	152	149	3
Fiscal impact	(32,649)	(32,646)	(3)
	81,635	81,613	22
Other comprehensive income / (loss) for the period	296,570	296,567	3
TOTAL COMPREHENSIVE INCOME FOR THE PERIOD	1,181,187	1,072,482	108,705

CHIEF ACCOUNTANT

THE EXECUTIVE COMMITTEE

See accompanying notes to the interim condensed consolidated financial statements.

(Thousands of euros)

	30 September 2024				
	Continuing operations	Discontinued operations	Total	Attributable to	
				Bank's Shareholders	Non-controlling interests
NET INCOME FOR THE PERIOD	792,985	322	793,307	714,097	79,210
ITEMS THAT MAY BE RECLASSIFIED TO THE INCOME STATEMENT (NOTE 44)					
Debt instruments at fair value through other comprehensive income					
Gains / (losses) for the period	94,937	—	94,937	69,165	25,772
Reclassification of gains / (losses) to profit or loss (note 5)	(1,196)	—	(1,196)	(1,162)	(34)
Cash flows hedging					
Gains / (losses) for the period	299,992	—	299,992	297,084	2,908
Other comprehensive income from investments in associates and others	10,565	—	10,565	10,558	7
Exchange differences arising on consolidation	12,063	—	12,063	1,280	10,783
IAS 29 application					
Effect on equity of Banco Millennium Atlântico, S.A.	1,712	—	1,712	1,712	—
Fiscal impact	(116,604)	—	(116,604)	(111,053)	(5,551)
	301,469	—	301,469	267,584	33,885
ITEMS THAT WILL NOT BE RECLASSIFIED TO THE INCOME STATEMENT					
Equity instruments at fair value through other comprehensive income					
Gains / (losses) for the period					
Subsidiaries	655	—	655	439	216
Associates	4,674	—	4,674	4,674	—
	5,329	—	5,329	5,113	216
Changes in own credit risk of financial liabilities at fair value through profit or loss (note 44)	2,323	—	2,323	2,323	—
Actuarial gains / (losses) for the period					
BCP Group Pensions Fund	(47,407)	—	(47,407)	(47,407)	—
Pension Funds of foreign subsidiaries and associates	(3,104)	—	(3,104)	(2,826)	(278)
Fiscal impact	8,534	—	8,534	8,543	(9)
	(34,325)	—	(34,325)	(34,254)	(71)
Other comprehensive income / (loss) for the period	267,144	—	267,144	233,330	33,814
TOTAL COMPREHENSIVE INCOME FOR THE PERIOD	1,060,129	322	1,060,451	947,427	113,024

CHIEF ACCOUNTANT

THE EXECUTIVE COMMITTEE

See accompanying notes to the interim condensed consolidated financial statements.

INTERIM CONDENSED CONSOLIDATED STATEMENT OF COMPREHENSIVE INCOME FOR THE THREE MONTHS PERIODS BETWEEN 1 JULY AND 30 SEPTEMBER 2025 AND 2024

(Thousands of euros)

	3 rd Quarter 2025		
	Attributable to		
	Continuing operations	Bank's Shareholders	Non-controlling interests
NET INCOME FOR THE PERIOD	314,100	273,639	40,461
ITEMS THAT MAY BE RECLASSIFIED TO THE INCOME STATEMENT			
Debt instruments at fair value through other comprehensive income			
Gains/(losses) for the period	22,942	15,281	7,661
Reclassification of gains / (losses) to profit or loss	(1,445)	(1,433)	(12)
Cash flows hedging			
Gains/(losses) for the period	80,846	80,416	430
Other comprehensive income from investments in associates and others	353	351	2
Exchange differences arising on consolidation	(10,127)	(5,136)	(4,991)
IAS 29 application			
Effect on equity of Banco Millennium Atlântico, S.A.	7	7	—
Fiscal impact	(29,357)	(27,771)	(1,586)
	63,219	61,715	1,504
ITEMS THAT WILL NOT BE RECLASSIFIED TO THE INCOME STATEMENT			
Equity instruments at fair value through other comprehensive income			
Gains/(losses) for the period			
Subsidiaries	58	78	(20)
Associates	(18)	(18)	—
	40	60	(20)
Changes in own credit risk of financial liabilities at fair value through profit or loss	1,054	1,054	—
Actuarial gains/(losses) for the period			
Pension Funds of foreign subsidiaries and associates	(2)	(1)	(1)
Fiscal impact	130	127	3
	1,222	1,240	(18)
Other comprehensive income/(loss) for the period	64,441	62,955	1,486
TOTAL COMPREHENSIVE INCOME FOR THE PERIOD	378,541	336,594	41,947

CHIEF ACCOUNTANT

THE EXECUTIVE COMMITTEE

See accompanying notes to the interim condensed consolidated financial statements.

(Thousands of euros)

	3 rd Quarter 2024				
	Continuing operations	Discontinued operations	Total	Attributable to	
				Bank's Shareholders	Non-controlling interests
NET INCOME FOR THE PERIOD	250,899	322	251,221	228,815	22,406
ITEMS THAT MAY BE RECLASSIFIED TO THE INCOME STATEMENT					
Debt instruments at fair value through other comprehensive income					
Gains/(losses) for the period	67,115	—	67,115	52,393	14,722
Reclassification of gains / (losses) to profit or loss	(503)	—	(503)	(493)	(10)
Cash flows hedging					
Gains/(losses) for the period	204,879	—	204,879	203,883	996
Other comprehensive income from investments in associates and others	(2,795)	—	(2,795)	(2,793)	(2)
Exchange differences arising on consolidation	(19,506)	—	(19,506)	(17,241)	(2,265)
IAS 29 application					
Effect on equity of Banco Millennium Atlântico, S.A.	1,670	—	1,670	1,670	—
Fiscal impact	(81,223)	—	(81,223)	(78,197)	(3,026)
	169,637	—	169,637	159,222	10,415
ITEMS THAT WILL NOT BE RECLASSIFIED TO THE INCOME STATEMENT					
Equity instruments at fair value through other comprehensive income					
Subsidiaries	539	—	539	350	189
Associates	45	—	45	45	—
	584	—	2,113	395	189
Changes in own credit risk of financial liabilities at fair value through profit or loss	69	—	69	69	—
Fiscal impact	(2,420)	—	(2,420)	(2,416)	(4)
	(1,767)	—	(1,767)	(1,952)	185
Other comprehensive income/(loss) for the period	167,870	—	167,870	157,270	10,600
TOTAL COMPREHENSIVE INCOME FOR THE PERIOD	418,769	322	419,091	386,085	33,006

CHIEF ACCOUNTANT

THE EXECUTIVE COMMITTEE

See accompanying notes to the interim condensed consolidated financial statements.

INTERIM CONDENSED CONSOLIDATED BALANCE SHEET AS AT 30 SEPTEMBER 2025 AND 31 DECEMBER 2024

		(Thousands of euros)	
	Notes	30 September 2025	31 December 2024
ASSETS			
Cash and deposits at Central Banks	19	3,940,899	5,589,030
Loans and advances to credit institutions repayable on demand	20	236,140	251,157
Financial assets at amortised cost			
Loans and advances to credit institutions	21	1,119,349	797,535
Loans and advances to customers	22	56,046,118	53,907,058
Debt securities	23	24,975,807	21,345,171
Financial assets at fair value through profit or loss			
Financial assets held for trading	24	1,385,568	1,763,402
Financial assets not held for trading mandatorily at fair value through profit or loss	24	340,229	355,211
Financial assets designated at fair value through profit or loss	24	37,397	33,894
Financial assets at fair value through other comprehensive income	24	15,572,034	12,898,966
Hedging derivatives	25	23,363	69,349
Investments in associates	26	435,833	429,423
Non-current assets held for sale	27	69,246	45,245
Investment property	28	14,404	24,183
Other tangible assets	29	571,795	619,146
Goodwill and intangible assets	30	297,037	275,970
Current tax assets	31	21,766	21,159
Deferred tax assets	31	1,873,215	2,253,457
Other assets	32	1,976,807	1,464,246
TOTAL ASSETS		108,937,007	102,143,602
LIABILITIES			
Financial liabilities at amortised cost			
Deposits from credit institutions and other funds	33	1,435,246	777,719
Deposits from customers and other funds	34	86,349,819	82,084,687
Non-subordinated debt securities issued	35	4,208,096	3,528,710
Subordinated debt	36	1,406,057	1,427,359
Financial liabilities at fair value through profit or loss			
Financial liabilities held for trading	37	264,820	179,627
Financial liabilities designated at fair value through profit or loss	38	3,473,260	3,248,857
Hedging derivatives	25	38,805	39,041
Provisions	39	1,247,496	1,085,858
Current tax liabilities	31	76,792	136,008
Deferred tax liabilities	31	7,381	7,434
Other liabilities	40	1,727,552	1,435,745
TOTAL LIABILITIES		100,235,324	93,951,045
EQUITY			
Share capital	41	3,000,000	3,000,000
Share premium	41	16,471	16,471
Other equity instruments	41	400,000	400,000
Legal and statutory reserves	42	464,659	384,402
Treasury shares	43	(200,000)	—
Reserves and retained earnings	44	3,038,288	2,387,592
Net income for the period attributable to Bank's Shareholders		775,915	906,378
Non-controlling interests	45	1,206,350	1,097,714
TOTAL EQUITY		8,701,683	8,192,557
TOTAL LIABILITIES AND EQUITY		108,937,007	102,143,602

CHIEF ACCOUNTANT

THE EXECUTIVE COMMITTEE

See accompanying notes to the interim condensed consolidated financial statements.

INTERIM CONDENSED CONSOLIDATED STATEMENT OF CASH FLOWS FOR THE NINE MONTHS PERIODS ENDED 30 SEPTEMBER 2025 AND 2024

	(Thousands of euros)	
	30 September 2025	30 September 2024
CASH FLOWS ARISING FROM OPERATING ACTIVITIES		
Interests received	2,337,046	2,697,346
Commissions received	815,605	807,230
Fees received from services rendered	92,642	92,049
Interests paid	(1,157,421)	(1,322,725)
Commissions paid	(124,792)	(155,495)
Recoveries on loans previously written off	9,869	60,506
Payments (cash) to suppliers and employees (*)	(1,166,308)	(1,066,212)
Income taxes (paid) / received	(126,537)	(172,246)
	680,104	940,453
Decrease / (increase) in operating assets:		
Receivables from / (Loans and advances to) credit institutions	(127,053)	(297,426)
Deposits held with purpose of monetary control	(194,073)	(68,581)
Loans and advances to customers receivable / (granted)	(2,050,839)	(889,746)
Short term trading securities	451,971	(982,110)
Increase / (decrease) in operating liabilities:		
Deposits from credit institutions repayable on demand	(733)	78,188
Deposits from credit institutions with agreed maturity date	661,083	62,003
Deposits from customers repayable on demand	3,022,136	1,195,535
Deposits from customers with agreed maturity date	1,351,318	3,019,853
	3,793,914	3,058,169
CASH FLOWS ARISING FROM INVESTING ACTIVITIES		
Dividends received	45,664	54,876
Interest income from financial assets at fair value through other comprehensive income and at amortised cost	853,097	719,448
Sale of financial assets at fair value through other comprehensive income and at amortised cost	4,463,444	1,856,005
Acquisition of financial assets at fair value through other comprehensive income and at amortised cost	(120,241,377)	(118,516,407)
Maturity of financial assets at fair value through other comprehensive income and at amortised cost	109,875,561	112,492,073
Acquisition of tangible and intangible assets	(89,014)	(87,093)
Sale of tangible and intangible assets	13,432	2,993
Decrease / (increase) in other sundry assets	(597,632)	(37,521)
	(5,676,825)	(3,515,626)
CASH FLOWS ARISING FROM FINANCING ACTIVITIES		
Issuance of subordinated debt	500,000	—
Reimbursement of subordinated debt	(529,500)	—
Issuance of debt securities	687,286	618,928
Repayment of debt securities	(24,695)	(268,827)
Issuance of commercial paper and other securities	274,154	48,333
Repayment of commercial paper and other securities	(132,647)	(4,272)
Issuance of Perpetual Subordinated Bonds in January 2024, net of expenses (Additional Tier 1)	—	397,600
Repayment of Perpetual Subordinated Bonds issued in January 2019, net of expenses (Additional Tier 1)	—	(400,000)
Purchase of own shares	(200,000)	—
Dividends paid to Bank's shareholders	(447,647)	(256,938)
Dividends paid to non-controlling interests	—	(28,727)
Interest paid of the issue of Perpetual Subordinated Bonds (Additional Tier 1)	(24,375)	(25,500)
Increase / (decrease) in other sundry liabilities and non-controlling interests (**)	185,050	18,354
	287,626	98,951
Exchange differences effect on cash and equivalents	(67,863)	12,063
Net changes in cash and equivalents	(1,663,148)	(346,443)
Cash (note 18)	666,175	688,501
Deposits at Central Banks (note 18)	4,922,855	3,857,025
Loans and advances to credit institutions repayable on demand (note 19)	251,157	337,687
CASH AND EQUIVALENTS AT THE BEGINNING OF THE PERIOD	5,840,187	4,883,213
Cash (note 18)	587,633	575,367
Deposits at Central Banks (note 18)	3,353,266	3,730,083
Loans and advances to credit institutions repayable on demand (note 19)	236,140	231,320
CASH AND EQUIVALENTS AT THE END OF THE PERIOD	4,177,039	4,536,770

(*) As at 30 September 2025, this balance includes the amount of EUR 84,000 (30 September 2024: EUR 208,000) related to short-term lease contracts and the amount of EUR 1,905,000 (30 September 2024: EUR 1,843,000) related to lease contracts of low value assets.

(**) As at 30 September 2025, this balance includes the amount of EUR 42,974,000 (30 September 2024: EUR 42,956,000) corresponding to principal payments on lease liabilities.

CHIEF ACCOUNTANT

THE EXECUTIVE COMMITTEE

See accompanying notes to the interim condensed consolidated financial statements.

INTERIM CONDENSED CONSOLIDATED STATEMENT OF CHANGES IN EQUITY FOR THE NINE MONTHS PERIODS ENDED 30 SEPTEMBER 2025 AND 2024

(Thousands of euros)

	Share capital	Share premium	Other equity instruments	Legal and statutory reserves	Treasury shares	Reserves and retained earnings	Net income attributable to Bank's Shareholders	Non-controlling interests (note 45)	Total equity
BALANCE AS AT 31 DECEMBER 2023 (RESTATE)	3,000,000	16,471	400,000	316,375	—	1,714,083	856,050	987,427	7,290,406
Net income for the period	—	—	—	—	—	—	714,097	79,210	793,307
Other comprehensive income	—	—	—	—	—	233,330	—	33,814	267,144
TOTAL COMPREHENSIVE INCOME	—	—	—	—	—	233,330	714,097	113,024	1,060,451
Results application:									
Legal reserve	—	—	—	68,027	—	(68,027)	—	—	—
Transfers for reserves and retained earnings	—	—	—	—	—	856,050	(856,050)	—	—
Dividends paid	—	—	—	—	—	(256,938)	—	—	(256,938)
Interest on perpetual subordinated bonds (Additional Tier 1)	—	—	—	—	—	(25,500)	—	—	(25,500)
Early repayment of perpetual subordinated bonds AT1 issued in January 2019 (note 41)	—	—	(400,000)	—	—	—	—	—	(400,000)
Perpetual subordinated bonds AT1 issued in January 2024 (note 41)	—	—	400,000	—	—	—	—	—	400,000
Expenses on the issuance of perpetual subordinated bonds AT1 (January 2024)	—	—	—	—	—	(2,400)	—	—	(2,400)
Taxes on expenses with the new AT1 issuance (January 2024)	—	—	—	—	—	751	—	—	751
Dividends (a)	—	—	—	—	—	—	—	(28,727)	(28,727)
Other reserves	—	—	—	—	—	2	—	(4)	(2)
BALANCE AS AT 30 SEPTEMBER 2024	3,000,000	16,471	400,000	384,402	—	2,451,351	714,097	1,071,720	8,038,041
Net income for the period	—	—	—	—	—	—	192,281	14,895	207,176
Other comprehensive income	—	—	—	—	—	(55,600)	—	11,078	(44,522)
TOTAL COMPREHENSIVE INCOME	—	—	—	—	—	(55,600)	192,281	25,973	162,654
Results application:									
Interest on perpetual subordinated bonds (Additional Tier 1)	—	—	—	—	—	(8,125)	—	—	(8,125)
Other reserves	—	—	—	—	—	(34)	—	21	(13)
BALANCE AS AT 31 DECEMBER 2024	3,000,000	16,471	400,000	384,402	—	2,387,592	906,378	1,097,714	8,192,557
Net income for the period	—	—	—	—	—	—	775,915	108,702	884,617
Other comprehensive income	—	—	—	—	—	296,567	—	3	296,570
TOTAL COMPREHENSIVE INCOME	—	—	—	—	—	296,567	775,915	108,705	1,181,187
Results application:									
Legal reserve(nota 42)	—	—	—	80,257	—	(80,257)	—	—	—
Transfers for reserves and retained earnings	—	—	—	—	—	906,378	(906,378)	—	—
Dividends paid	—	—	—	—	—	(447,646)	—	—	(447,646)
Interest on perpetual subordinated bonds (Additional Tier 1)	—	—	—	—	—	(24,375)	—	—	(24,375)
Treasury shares (note 43)	—	—	—	—	(200,000)	—	—	—	(200,000)
Other reserves	—	—	—	—	—	29	—	(69)	(40)
BALANCE AS AT 30 SEPTEMBER 2025	3,000,000	16,471	400,000	464,659	(200,000)	3,038,288	775,915	1,206,350	8,701,683

(a) Dividends of BIM - Banco Internacional de Moçambique, S.A.

CHIEF ACCOUNTANT

THE EXECUTIVE COMMITTEE

See accompanying notes to the consolidated financial statements.

1. Accounting policies

A. Basis of presentation

Banco Comercial Português, S.A. (the 'Bank') is a private capital bank, established in Portugal in 1985. It started operating on 5 May 1986, and these interim condensed consolidated financial statements reflect the results of the operations of the Bank and all its subsidiaries (together referred to as the 'Group') and the Group's interest in associates, for the nine-month periods ended on 30 September 2025 and 2024.

In accordance with Regulation (EC) no. 1606/2002 of the European Parliament and of the Council of 19 July 2002, and Banco de Portugal Notice no. 5/2015 (which revoked Banco de Portugal Notice no. 1/2005), the Group's consolidated financial statements are required to be prepared, since 2005, in accordance with International Financial Reporting Standards (IFRS) as endorsed by the European Union (EU). IFRS comprise accounting standards issued by the International Accounting Standards Board (IASB), as well as interpretations issued by the International Financial Reporting Interpretations Committee (IFRIC) and its predecessor bodies. The interim condensed consolidated financial statements and the accompanying notes were approved on 25 November 2025 by the Bank's Board of Directors and are presented in thousands of euros, rounded to the nearest thousand.

All the references in this document related to any normative always report to the respective current version.

The interim condensed consolidated financial statements for the nine-month periods ended on 30 September 2025 were prepared for the purpose of recognition and measurement, in accordance with the IAS 34 - Interim Financial Reporting adopted by the EU and, therefore, they do not include all the information required in accordance with IFRS adopted by the EU. Consequently, the adequate comprehension of the interim condensed consolidated financial statements requires that they should be read with the consolidated financial statements with reference to 31 December 2024.

These consolidated financial statements are a translation of the financial statements originally issued in Portuguese. In the event of discrepancies, the Portuguese version prevails.

A1. Comparative information

The Group has adopted IFRS and interpretations mandatory for accounting periods beginning on or after 1 January 2025. The accounting policies were applied consistently to all entities of the Group and are consistent with those used in the preparation of the financial statements of the previous period.

The Group's financial statements were prepared under the going concern assumption, the accrual-based accounting regime and under the historical cost convention, as modified by the application of fair value for derivative financial instruments, financial assets and liabilities at fair value through profit or loss and financial assets at fair value through other comprehensive income. Financial assets and liabilities that are covered under hedge accounting are stated at fair value in respect of the risk that is being hedged, if applicable. Other financial assets and liabilities and non-financial assets and liabilities are stated at amortised cost or historical cost. Non-current assets and disposal groups held for sale are stated at the lower of carrying amount or fair value less costs to sell. Investment properties recognised on the Group's balance sheet are recognised at fair value. The liability for defined benefit obligations is recognised as the present value of the past liabilities with pensions net of the value of the fund's assets.

The preparation of the financial statements in accordance with IFRS requires the Board of Directors, under advice of the Executive Committee, to make judgments, estimations and assumptions that affect the application of the accounting policies and reported amounts of assets, liabilities, income and expenses. The estimations and associated assumptions are based on historical experience and other factors that are believed to be reasonable under the circumstances and form the basis for making the judgments about the carrying values of assets and liabilities that are not readily apparent from other sources. Actual results may differ from these estimations. The issues involving a higher degree of judgment or complexity or for which assumptions and estimations are significant are presented in note 1.Y.

B. Basis of consolidation

The interim condensed consolidated financial statements now presented reflect the assets, liabilities, income and expenses of the Bank and its subsidiaries (the Group), and the results attributable to the Group financial investments in associates.

B1. Investments in subsidiaries

Subsidiaries are entities controlled by the Group (including structure entities and investment funds). The Group controls an entity when it holds the power to direct the relevant activities of the entity, and when it is exposed, or has rights, to variable returns from its involvement with the entity and can take possession of these results through the power it holds over the relevant activities of that entity (de facto control). The financial statements of subsidiaries are included in the consolidated financial statements from the date on which control commences until the date on which control ceases.

Accumulated losses are attributed to non-controlling interests in the respective proportion, implying that the Group can recognise negative non-controlling interests.

On a step acquisition process resulting in the acquisition of control, the revaluation of any participation previously acquired is recorded against the profit and loss account when goodwill is calculated. On a partial disposal resulting in loss of control over a subsidiary, any participation retained is revalued at market value on the sale date and the gain or loss resulting from this revaluation is booked against the income statement.

B2. Investments in associates

Investments in associates are recorded by the equity method from the date that the Group acquires significant influence until the date it ceases to exist. Associates are those entities in which the Group has significant influence but not control over the financial and operating policy decisions of the investee. It is assumed that the Group has significant influence when it holds, directly or indirectly, more than 20% of the voting rights of the investee. If the Group holds, directly or indirectly, less than 20% of the voting rights of the investee, it is presumed that the Group does not have significant influence, unless such influence can be clearly demonstrated.

The existence of significant influence by the Group is usually evidenced in one or more of the following ways:

- representation on the Board of Directors or equivalent governing body of the investee;
- participation in policy-making processes, including participation in decisions about dividends or other distributions;
- material transactions between the Group and the investee;
- interchange of the management team;
- provision of essential technical information.

The consolidated financial statements include the part that is attributable to the Group of the total reserves and results of associates accounted on an equity basis. When the Group's share of losses exceeds its interest in the associate, the carrying amount is reduced to zero and recognition of further losses is discontinued, with exception of the part in which the Group incurs in a legal obligation to assume these losses on behalf of an associate.

B3. Goodwill

Business combinations are accounted under the purchase method. The acquisition cost corresponds to the fair value, determined at the acquisition date, of the assets given and liabilities incurred or assumed. Costs directly attributable to the acquisition of a subsidiary are recorded directly in the income statement.

Positive goodwill arising from acquisitions is recognised as an asset carried at acquisition cost and is not subject to amortisation, however, it is subject to impairment tests. Goodwill arising from the acquisition of subsidiaries and associates is defined as the difference between the cost of acquisition and the total or corresponding share of the fair value of the net assets and contingent liabilities acquired, depending on the option taken.

Negative goodwill arising from an acquisition is recognised directly in the income statement of the period in which the business combination occurs.

Goodwill is not adjusted due to changes in the initial estimation of the contingent purchase price, being the difference recorded in the income statement or in equity, when applicable.

According to IFRS 3 – Business combinations, if the initial accounting of a business combination is not concluded until the end of the first financial reporting period in which the combination occurs, it is recorded at the respective provisional values. These provisional values can be adjusted over the measurement period, which can't exceed a year since the acquisition date. Over this period, the Group should retrospectively adjust the amounts recognised previously on the acquisition date, to reflect newly obtained information about facts and circumstances that existed at the acquisition date and that, if they were known by then, would have impacted the measurement of the amounts recognised at that date.

During this period, the Group should also recognise additional assets and liabilities in the case of obtaining new information about facts and circumstances that existed at the acquisition date and that, if they were known by then, would have resulted in the recognition of those assets and liabilities at that time.

The recoverable amount of the goodwill recorded in the Group's asset is assessed annually in the preparation of the accounts with reference to the end of the year or whenever there are indications of eventual loss of value. Impairment losses are recognised in the income statement. The recoverable amount is determined based on the higher of the asset value in use and the market value after deducting selling costs, calculated using valuation methodologies supported by discounted cash flow techniques, considering market conditions, the time value of money and the business risks.

B4. Purchases and dilution of non-controlling interests

The acquisition of non-controlling interests that do not impact the control position of a subsidiary is accounted as a transaction with shareholders and, therefore, no additional goodwill resulting from this transaction is recognised. The difference between the acquisition cost and the fair value of non-controlling interests acquired is recognised directly in reserves. On this basis, the gains and losses resulting from the sale of controlling interests that do not impact the control position of a subsidiary are always recognised against reserves.

B5. Loss of control

The gains or losses resulting from the dilution or sale of a financial position in a subsidiary, with loss of control, are recognised by the Group in the income statement.

B6. Investments in foreign subsidiaries and associates

The financial statements of foreign subsidiaries and associates of the Group are prepared in their functional currency, defined as the currency of the primary economic environment in which they operate or the currency in which the subsidiaries obtain their income or finance their activity. In the consolidation process, assets and liabilities, including goodwill, of foreign subsidiaries are converted into euro at the official exchange rate on the balance sheet date.

Regarding the investments in foreign operations that are consolidated under the full consolidation or equity methods, exchange differences, between the conversion to euro of the equity at the beginning of the year and its value in euro at the exchange rate on the balance sheet date in which the consolidated accounts are reported, are recognised against "Reserves - exchange differences". The changes in fair value resulting from instruments that are designated and qualified as hedging instruments related to foreign operations are recorded in equity under "Reserves and retained earnings". Whenever the hedge is not fully effective, the ineffective portion is accounted against profit and loss of the year.

The income and expenses of these subsidiaries are converted to euro at an approximate rate of the rates on the dates of the transactions, using a monthly average considering the initial and final exchange rates of each month. Exchange differences from the conversion to euro of the profits and losses for the reporting period, arising from the difference between the exchange rate used in the income statement and the exchange rate prevailing at the balance sheet date, are recognised in "Reserves and retained earnings - exchange differences resulting from the consolidation of Group's companies".

On disposal of investments in foreign subsidiaries for which there is loss of control, exchange differences related to the investment in the foreign operation and to the associated hedge transaction previously recognised in reserves are transferred to profit and loss, as part of the gains or loss arising from the disposal.

The Group applies IAS 29 – Financial reporting in hyperinflationary economies in financial statements of entities that present accounts in functional currency of an economy that has hyperinflation. In applying this policy, non-monetary assets and liabilities are adjusted based on the price index from the date of acquisition. The restated values of assets are reduced by the amount that exceeds their recoverable amount, in accordance with the applicable IFRS.

B7. Transactions eliminated on consolidation

The balances and transactions between Group's companies, as well as any unrealised gains and losses arising from these transactions, are eliminated in the preparation of the consolidated financial statements. Unrealised gains and losses arising from transactions with associates and jointly controlled entities are eliminated in the proportion of the Group's investment in these entities.

C. Financial instruments (IFRS 9)

C1. Financial assets

C1.1. Classification, initial recognition and subsequent measurement

At the initial recognition, financial assets are classified into one of the following categories:

- "Financial assets at amortised cost";
- "Financial assets at fair value through other comprehensive income"; or,
- "Financial assets at fair value through profit or loss".

The classification is made taking into consideration the following aspects:

- the Group's business model for the management of the financial asset; and,
- the characteristics of the contractual cash flows of the financial asset.

Business Model Evaluation

The Group, at the time of acquisition of financial instruments, carried out an evaluation of the business model in which the are held at portfolio level, since this approach reflects how assets are managed and how that information is made available to management bodies. The information considered in this evaluation included:

- the policies and purposes established for the portfolio and the practical operability of these policies, including how the management strategy focuses on receiving contractual interest, maintaining a certain interest rate profile, adjusting the duration of financial assets to the duration of liabilities that finance these assets or on the realization of cash flows through the sale of the assets;
- how the performance of the portfolio is evaluated and reported to the Group's management bodies;
- the evaluation of the risks that affect the performance of the business model (and of the financial assets held under this business model) and the way these risks are managed;
- the remuneration of business managers, i.e., in what way the compensation depends on the fair value of the assets under management or on contractual cash flows received; and,
- the frequency, volume and sales periodicity in previous periods, the reasons for these sales and the expectations about future sales. However, sales information should not be considered individually, but as part of an overall assessment of how the Group establishes financial asset management objectives and how cash flows are obtained.

Financial assets held for trading and financial assets managed and evaluated at fair value by option are measured at fair value through profit or loss because they are not held either for the collection of contractual cash flows (HTC), nor for the collection of cash flows and sale of these financial assets (HTC and Sell).

Evaluation if the contractual cash flows correspond to Solely Payments of Principal and Interest (SPPI)

For the purposes of this assessment, "principal" is defined as the fair value of the financial asset at initial recognition. "Interest" is defined as the counterparty for the time value of money, for the credit risk associated with the amount owed over a given period and for other risks and costs associated with the activity (e.g., liquidity risk and administrative costs), as well as for a profit margin.

In the evaluation of the financial instruments in which contractual cash flows refer exclusively to the receipt of principal and interest, the Group considered the original contractual terms of the instrument. This evaluation included the analysis of the existence of situations in which the contractual terms can modify the periodicity and the amount of the cash flows so that they do not fulfil the SPPI condition. In the evaluation process, the Group considered:

- contingent events that may change the periodicity and the amount of the cash flows;
- characteristics that result in leverage;
- terms of prepayment and extension of maturity;
- terms that may limit the right of the Group to claim cash flows in relation to specific assets (e.g., contracts with terms that prevent access to assets in case of default – non-recourse asset); and,
- characteristics that may change the time value of money.

In addition, an advance payment is consistent with the SPPI criterion if:

- the financial asset is acquired or originated with a premium or discount in relation to the contractual nominal value;
- the prepayment represents substantially the nominal amount of the contract plus accrued contractual interest, but not paid (may include reasonable compensation for prepayment); and,
- the prepaid fair value is insignificant at initial recognition.

C1.1.1. Financial assets at amortised cost

Classification

A financial asset is classified under the category "Financial assets at amortised cost" if both of the following conditions are met:

- the financial asset is held within a business model whose objective is to hold financial assets in order to collect their contractual cash flows; and,
- its contractual cash flows occur on specific dates and are solely payments of principal and interest on the principal amount outstanding (SPPI).

The "Financial assets at amortised cost" category includes loans and advances to credit institutions, loans and advances to customers and debt instruments managed based on a business model whose purpose is to receive their contractual cash flows (government bonds, bonds issued by companies and commercial paper).

Initial recognition and subsequent measurement

Loans and advances to credit institutions and loans and advances to customers are recognised at the date the funds are made available to the counterparty (settlement date). Debt instruments are recognised on the trade date, that is, on the date the Group accepts to acquire them.

Financial assets at amortised cost are initially recognised at fair value plus transaction costs and are subsequently measured at amortised cost. In addition, they are subject, at their initial recognition, to the measurement of impairment losses for expected credit losses (note C1.5), which are recognised in "Impairment of financial assets measured at amortised cost".

Interest of financial assets at amortised cost is recognised under "Interest and similar income", based on the effective interest rate method and in accordance with the criteria described in note C3.

Gains or losses generated at the time of derecognition are recorded in "Gains/(losses) arising from derecognition of financial assets and liabilities not measured at fair value through profit or loss".

C1.1.2. Financial assets at fair value through other comprehensive income

Classification

A financial asset is classified under the category of "Financial assets at fair value through other comprehensive income" if both of the following conditions are met:

- the financial asset is held within a business model whose objective is both to collect its contractual cash flows and to sell this financial asset; and,
- its contractual cash flows occur on specific dates and are solely payments of principal and interest on the principal amount outstanding (SPPI).

In addition, at the initial recognition of an equity instrument that is not held for trading, nor a contingent retribution recognised by an acquirer in a business combination to which IFRS 3 applies, the Group may irrevocably choose to classify it in the category of "Financial assets at fair value through other comprehensive income" (FVOCI). This option is exercised on a case-by-case basis and is only available for financial instruments that comply with the definition of equity instruments provided in IAS 32 and cannot be used for financial instruments whose classification as an equity instrument under the scope of the issuer is made under the exceptions provided in paragraphs 16A to 16D of IAS 32.

Initial recognition and subsequent measurement

Debt instruments at fair value through other comprehensive income are initially recognised at fair value plus transaction costs and are subsequently measured at fair value. Changes in the fair value of these financial assets are recognised against other comprehensive income and, at the time of their disposal, the respective gains or losses accumulated in other comprehensive income are reclassified to a specific income statement item designated "Gains or losses on derecognition of financial assets at fair value through other comprehensive income".

Debt instruments at fair value through other comprehensive income are also subject from their initial recognition to the measurement of impairment losses for expected credit losses (note C1.5). Impairment losses are recognised in the income statement under "Impairment of financial assets at fair value through other comprehensive income", against "Other comprehensive income", and do not reduce the carrying amount of the financial asset in the balance sheet.

Interest, premiums or discounts on financial assets at fair value through other comprehensive income are recognised in "Interest and similar income", based on the effective interest rate method and in accordance with the criteria described in note C3.

Equity instruments at fair value through other comprehensive income are initially recognised at fair value plus transaction costs and are subsequently measured at fair value. The changes in the fair value of these financial assets are recognised against "Other comprehensive income". Dividends are recognised in the income statement when the right to receive them is attributed.

Impairment is not recognised for equity instruments at fair value through other comprehensive income, and the respective accumulated gains or losses recognised in "Fair value changes" are transferred to "Retained earnings" at the time of their derecognition.

C1.1.3. Financial assets at fair value through profit or loss

Classification

A financial asset is classified in the category "Financial assets at fair value through profit and loss" if the business model defined by the Group for its management or the characteristics of its contractual cash flows do not meet the conditions described above to be measured at amortised cost or at fair value through other comprehensive income (FVOCI).

In addition, the Group may irrevocably designate a financial asset at fair value through profit or loss that meets the criteria to be measured at amortised cost or at FVOCI at the time of its initial recognition if this eliminates or significantly reduces an inconsistency in measurement or recognition (accounting mismatch), that will otherwise arise from measuring assets or liabilities or recognising their gains and losses in different bases.

The Group classified "Financial assets at fair value through profit and loss" in the following items:

a) "Financial assets held for trading"

These financial assets are acquired with the purpose of short-term selling; at the initial recognition, they are part of a portfolio of identified financial instruments and for which there is evidence of profit-taking in the short-term; or they can be defined as derivatives (except for hedging derivatives).

b) "Financial assets not held for trading mandatorily at fair value through profit or loss"

This item classifies debt instruments whose contractual cash flows do not correspond only to repayments of principal and interest on the principal amount outstanding (SPPI).

c) "Financial assets designated at fair value through profit or loss" (Fair Value Option)

This item includes the financial assets that the Group has chosen to designate at fair value through profit or loss to eliminate accounting mismatch.

Initial recognition and subsequent measurement

Considering that the transactions carried out by the Group in the normal course of its business are in market conditions, financial assets at fair value through profit or loss are initially recognised at their fair value, with the costs or income associated with the transactions recognised in profit and loss at the initial moment. Subsequent changes in the fair value of these assets are recognised in profit and loss.

The accrual of interest and of the premium/discount (when applicable) is recognised in "Net interest income", based on the effective interest rate of each transaction, except the accrual of interest from trading derivatives that are recognised in "Gains/(losses) on financial operations at fair value through profit or loss". Dividends are recognised in profit and loss when the right to receive them is attributed.

Trading derivatives with a positive fair value are included in the item "Financial assets held for trading", while trading derivatives with negative fair value are included in "Financial liabilities held for trading".

C1.2. Reclassification between categories of financial assets

Financial assets should be reclassified into other categories only if the business model used in their management has changed. In this case, all financial assets affected must be reclassified.

The reclassification must be applied prospectively from the date of reclassification and any gains, losses (including the ones related to impairment) or interest previously recognised should not be restated.

The reclassification of investments in equity instruments measured at fair value through other comprehensive income is not allowed, nor of financial instruments designated at fair value through profit or loss.

C1.3. Modification and derecognition of financial assets

General principles

- i) The Group shall derecognise a financial asset when, and only when:
 - the contractual rights to the cash flows from the financial asset expire; or,
 - it transfers the financial asset as set out in notes ii) and iii) below and the transfer qualifies for derecognition in accordance with note iv).
- ii) The Group transfers a financial asset if, and only if, it either:
 - transfers the contractual rights to receive the cash flows of the financial asset; or,
 - retains the contractual rights to receive the cash flows of the financial asset but assumes a contractual obligation to pay the cash flows to one or more recipients in an arrangement that meets the conditions presented in note iii).
- iii) When the Group retains the contractual rights to receive the cash flows of a financial asset (the 'original asset'), but assumes a contractual obligation to pay these cash flows to one or more entities (the 'eventual recipients'), the Group shall treat the transaction as a transfer of a financial asset if all the following three conditions are met:
 - the Group does not have any obligation to pay amounts to the eventual recipients, unless it collects equivalent amounts from the original asset. Short-term advances with the right of full recovery of the amount lent, plus accrued interest at market rates, do not violate this condition;
 - the Group is contractually prohibited from selling or pledging the original asset other than as a security to the eventual recipients due its obligation to pay them cash flows; and,
 - the Group has an obligation to remit any cash flows it collects on behalf of the eventual recipients without material delay. In addition, it is not entitled to reinvest such cash flows, except for investments in cash or cash equivalents (as defined in IAS 7 – Statement of Cash Flows) during the short settlement period from the collection date until the date of required remittance to the eventual recipients, and interest earned on such investments is passed to the eventual recipients.
- iv) When the Group transfers a financial asset (see note ii) above), it shall evaluate the extent to which it retains the risks and benefits arising from owning the financial asset. In this case:
 - if the Group transfers substantially all the risks and benefits arising from owning the financial asset, it shall derecognise the financial asset and recognise separately any rights and obligations created or retained in the transfer, as assets or liabilities;
 - if the Group retains substantially all the risks and benefits arising from owning the financial asset, it shall continue to recognise the financial asset;
 - if the Group neither transfers nor retains substantially all the risks and benefits arising from owning the financial asset, it shall determine whether it retained control of the financial asset. In this case:
 - a) if the Group did not retain control, it shall derecognise the financial asset and recognise separately, as assets or liabilities, any rights and obligations created or retained in the transfer;
 - b) if the Group retained control, it shall continue to recognise the financial asset to the extent of its continued involvement in the financial asset.

- v) The transfer of risks and benefits (see prior note) is evaluated by comparing the Group's exposure, before and after the transfer, with the variability in the amounts and timing of the net cash flows of the transferred asset.
- vi) The question of whether the Group retained or not control (see note iv) above) over the transferred asset depends on the transferee's ability to sell the asset. If the transferee has the practical ability to sell the asset in its entirety to an unrelated third party and can exercise that ability unilaterally without needing to impose additional restrictions on the transfer, the entity did not retain control. In all other cases, the entity retained control.

Derecognition criteria

In the context of the general principles listed in the previous section, and considering that contract modification processes may lead, in some circumstances, to the derecognition of the original financial assets and recognition of new ones (subject to POCI identification), the purpose of this section is to set the criteria and circumstances that may lead to the derecognition of a financial asset.

The Group considers that a modification of the terms and conditions of a credit exposure will result in derecognition of the transaction and in recognition of a new transaction when the modification translates into at least one of the following conditions:

- Creation of a new exposure that results from a debt consolidation, without any of the derecognised instruments having a nominal value higher than 90% of the nominal amount of the new instrument;
- Double extension of the residual maturity, provided that the extension is not shorter than 3 years compared to the residual maturity in the moment of the modification;
- Increase of on balance exposure by more than 10% compared to the nominal amount (refers to the last approved amount on the operation subject to modification);
- Change in qualitative features, namely:
 - i) Change of currency, unless the exchange rate between the old and the new currency is pegged or managed within limits restricted by law or the relevant monetary authorities;
 - ii) Exclusion or addition of a substantial equity conversion feature to a debt instrument, unless it is not reasonably possible that it will be exercised over its term;
 - iii) Transfer of the instrument's credit risk to another borrower, or a significant change in the structure of borrowers within the instrument.
 - iv) Deletion or addition to the debt instrument of features of the "Pay If You Can" type or dependent on the financial performance of the debt instrument.

In the case of a restructuring due to financial difficulties of the debtor, only the criteria set out in items ii, iii and iv of the above paragraphs should be checked (the other criteria listed in this paragraph are not relevant in such situations).

Under the regulatory changes that occurred in Poland and the negotiations with customers holding mortgage loans in foreign currency described in note 53, and which correspond to contractual modifications made in accordance with IFRS 9, when the cash flows resulting from the agreement are subject to modification and a given asset is not derecognised, the Group adjusts the gross book value of the financial asset and recognises the profit or loss due to the modification in the Income Statement - Results on modification. The adjustment to the gross carrying amount of a financial asset is the difference between the discounted cash flows before and after contract modification.

Loans written-off

The Group writes off a loan when it does not have reasonable expectations of recovering a financial asset in its entirety or partially. The loans recoveries and loans written off are recorded under the headings Impairment of financial assets at amortized cost and in off-balance sheet accounts, respectively.

C1.4. Purchased or originated credit-impaired assets

Purchased or originated credit-impaired (POCI) assets are assets that present objective evidence of credit impairment in the moment of their initial recognition. An asset is credit-impaired if one or more events have occurred with a negative impact on the estimated future cash flows of the asset.

The two events that lead to the origin of a POCI exposure are presented as follows:

- financial assets arising from a recovery process, where there have been changes to the terms and conditions of the original agreement, which presented objective evidence of impairment that resulted in its derecognition (note C1.3) and recognition of a new contract that reflects the credit losses incurred;
- financial assets acquired with a significant discount, where the existence of a significant discount reflects credit losses incurred at the time of their initial recognition.

At initial recognition, POCI assets do not carry an impairment allowance. Instead, lifetime expected credit losses (ECL) are incorporated into the calculation of the effective interest rate (EIR). Consequently, at initial recognition, the gross book value of POCI (initial balance) is accounted for at fair value and it's equal to the net book value before being recognised as POCI (difference between the initial balance and the total discounted cash flows).

C1.5. Impairment losses

C1.5.1. Financial instruments subject to impairment losses recognition

The Group recognises impairment losses for expected credit losses on financial instruments recognised in the following accounting items:

C1.5.1.1. Financial assets at amortised cost

Impairment losses on financial assets at amortised cost reduce the balance sheet value of these financial assets against the item "Impairment of financial assets at amortised cost" (in the income statement).

C1.5.1.2. Debt instruments at fair value through other comprehensive income

Impairment losses for debt instruments at fair value through other comprehensive income are recognised in the income statement under "Impairment of financial assets at fair value through other comprehensive income", against other comprehensive income (they do not reduce the balance sheet amount of these financial assets).

C1.5.1.3. Credit commitments, documentary credits and financial guarantees

Impairment losses associated with credit commitments, documentary credits and financial guarantees are recognised in liabilities, under the balance "Provisions for guarantees and other commitments", against "Other provisions" (in the income statement).

C1.5.2. Classification of financial instruments by stages

	Changes in credit risk since the initial recognition		
	Stage 1	Stage 2	Stage 3
Classification criterion	Initial recognition	Significant increase in credit risk since initial recognition	Impaired
Impairment losses	12-month expected credit losses	Lifetime expected credit losses	

The Group determines the expected credit losses of each operation as a result of the deterioration of credit risk since its initial recognition. For this purpose, operations are classified into one of the following three stages:

- Stage 1: the operations in which there is no significant increase in credit risk since its initial recognition are classified in this stage. Impairment losses associated with operations classified in this stage correspond to expected credit losses resulting from a default event that may occur within 12 months after the reporting date (12-month expected credit losses);
- Stage 2: the operations in which there is a significant increase in credit risk since its initial recognition (note C1.5.3) but are not impaired (note C1.5.4) are classified in this stage. Impairment losses associated with operations classified in this stage correspond to the expected credit losses resulting from default events that may occur over the expected residual life of the operations (lifetime expected credit losses);
- Stage 3: impaired operations are classified in this stage. Impairment losses associated with operations classified at this stage correspond to lifetime expected credit losses.

C1.5.3. Significant increase in credit risk (SICR)

The Group uses a set of criteria to determine whether there is a significant increase in the Probability of Default (PD) (Significant increase in Credit Risk) associated with credit exposures, which leads to a stage 2 classification. Among the criteria considered by the Group, the following are noteworthy: (i) customers classified with an internal procedural risk grade of 123 or 124, for material arrears exceeding 30 days or in the context of credit recovery procedures, or classified as unrated; (ii) customers with a downgrade in their internal risk grade, above pre-defined thresholds, between the initial recognition date of the contract and the impairment calculation date; (iii) customers with restructured exposures due to financial difficulties, (iv) customers with incidents reported through the Banco de Portugal's CRC, and (v) customers subject to individual analysis for whom a stage 2 classification has been concluded due to the occurrence of a significant increase in credit risk, taking into account a set of predetermined indicators.

Exposures that no longer meet the criteria to be classified as stage 2 are classified as stage 1.

C1.5.4. Definition of financial assets in default and impaired

All customers who meet at least one of the following conditions are marked as default and, consequently, in NPE:

a) Delay over 90 days of material payment:

- Amounts of principal, interest or fees not paid on the due date that, cumulatively, represent:

- i) more than EUR 100 (retail) or more than EUR 500 (non-retail); and,
- ii) more than 1% of the total debt (direct liabilities).

After these two conditions are met, the counting of days of delay begins: if more than 90 consecutive days in which the customer is in this situation have been counted, it is classified as default.

The existence of a material payment delay gives rise to the default setting of all holders of the operation (or operations).

b) Signs of low probability of payment:

- i. Credit restructuring due to financial difficulties with loss of value;
- ii. Delay after restructuring due to financial difficulties;
- iii. Recurrence of restructuring due to financial difficulties;
- iv. Credit with signs of impairment (or stage 3 of IFRS 9);
- v. Insolvency or equivalent proceedings;
- vi. Litigation;
- vii. Guarantees of operations in default;
- viii. Credit sales with losses;
- ix. Credit fraud;
- x. Unpaid credit status;
- xi. Breach of covenants in a credit agreement;
- xii. Spread of default in an economic group;
- xiii. Cross default in BCP Group.

C1.5.5. Estimates of expected credit losses - Individual analysis

1. Customers who are in one of the following conditions are subject to individual analysis:

Customers in default	Customers in litigation or insolvency, if the total exposure of the group members in these situations exceeds EUR 1 million
	Customers integrated into groups with an exposure over EUR 5 million, if they have a risk grade 125
Groups or customers who are not in default	Other customers belonging to groups in the above conditions
	Groups or customers with an exposure over EUR 5 million, if a group member has a risk grade 124 or has a restructured loan and a risk grade 123
	Groups or customers with an exposure over EUR 10 million, if at least one member of the group is in stage 2
	Groups or customers not included in the preceding paragraphs, whose exposure exceeds EUR 25 million

2. Regardless of the criteria described in the previous point, the individual analysis is only performed for customers with a credit exposure over EUR 500,000, while customers with exposure below this limit are not considered for the purpose of determining the exposure referred to in the previous point.
3. Other customers that do not meet the criteria defined in 1 will also be subject to individual analysis, if under the following conditions:
- they have impairment as a result of the latest individual analysis;
 - are classified in stage 2 as a result of the latest revision of the questionnaire analysing the signs of financial difficulties;
 - according to recent information, they show a significant deterioration in risk levels.
4. The individual analysis includes the following procedures:
- for customers that are not in default, the analysis of financial difficulties indicators to determine whether the customer has objective signs of impairment, or whether it should be classified in stage 2 given the occurrence of a significant increase in credit risk, considering for this purpose a set of predetermined signs;
 - for customers in default or for which the previous analysis has allowed to conclude that the customer has objective signs of impairment, determination of the loss.
5. For the situations identified in the first paragraph of point 4 above, involving corporate customers, the analysis is the responsibility of the Rating Division, and the responsibility of the Credit Division for the remaining customers.
6. For the situations identified in the second paragraph of point 4 above, the individual analysis to determine the loss is the responsibility of the customer's management divisions and of the Credit Division, the latter with regard to the customers managed by the Commercial Networks.

The assessment of existence of impairment losses in individual terms is determined through an analysis of the total credit exposure on a case-by-case basis. For each loan considered individually significant, the Group assessed at each balance sheet date the existence of objective evidence of impairment. In the assessment of impairment losses in individual terms, the following factors were considered:

- total exposure of each customer towards the Group and the existence of overdue loans;
 - viability of the customer's business and its capacity to generate enough cash flows to service debt obligations in the future;
 - the existence, nature and estimated value of the collaterals associated to each loan;
 - the customer's available assets in liquidation or insolvency situations;
 - the existence of preferential creditors;
 - the amount and expected recovery term.
7. Each of the units referred to in the previous point is responsible for assigning an expectation and a recovery period to exposures relating to customers subject to individual analysis, which must be transmitted to the Risk Office as part of the regular process of collecting information, accompanied by detailed justification of the proposed impairment.

8. The expected recovery shall be represented by a recovery rate of the total outstanding exposure, which may be a weighted rate considering the different recovery prospects for each part of the customer's liabilities.
9. The recovery estimation referred to in the previous point should be influenced by future prospects (forward-looking), contemplating not only a more expected scenario but also alternative scenarios (an unbiased and probability-weighted amount). The application and weighting of the scenarios should be carried out both in a global perspective and in an individualized perspective, the latter when cases that, due to their specificity, have a high degree of uncertainty regarding the expected recovery estimation are identified.
10. The macroeconomic adjustment set out in previous point should be analysed annually and weighted according to the type of recovery strategy associated with the exposure under analysis:
 - for Going Concern strategies (i.e., the estimation is based on the cash flows of the business), the possibility of applying the 2 additional macroeconomic scenarios (optimistic and pessimistic) should be analysed in a global way, to ascertain if there is the risk of a skewed view of the expected losses from the consideration of only one scenario;
 - for Gone Concern strategies (i.e., the recovery estimation is based on the realization of the collateral), the impact of the macroeconomic scenario on collaterals should be analysed, for example, to what extent the projected real estate index indicates significant changes ahead for the current valuation values.
11. It is the responsibility of the units referred to in points 5 and 6 to consider in their forecast macroeconomic expectations that may influence the recoverability of the debt.
12. For the purposes of the preceding paragraphs, the Group's Economic Studies Area shall disclose the macroeconomic data that allow the estimations to be made.
13. The decision to consider global impacts related to the going and gone concern scenarios should be made by the Risk Committee, as proposed by the Risk Office.
14. For specific cases with a high degree of uncertainty, the allocation of alternative scenarios should be considered casuistically. Examples of recovery situations with a degree of uncertainty include:
 - recovery of collateral in geographies in which the Group has no relevant recovery experience;
 - recovery of debt related to geographies in which there is strong political instability;
 - recovery of non-real estate collateral for which there is no evidence of market liquidity;
 - recovery of related collateral or government guarantees in a currency other than the country's own;
 - recovery of debt related to debtors for whom there is a strong negative public exposure.
15. The Risk Office is responsible for reviewing the information collected and for clarifying all identified inconsistencies, as well as for the final decision on the customer's impairment.
16. Customers that have objective signs of impairment, but an individual impairment amount is equal to zero, are included in the collective analysis, assuming a PD 12-month equivalent to the risk grade 115 of the Master Scale.
17. The individual impairment analysis must be carried out annually and may be carried out more frequently for customers who fall into certain situations of possible increased risk. In case significant signs of deterioration or improvement in the customer's economic and financial situation are detected, as well as the macroeconomic conditions affecting the customer's ability to accomplish debt, it is the responsibility of the Risk Office to promote the review of the expected impairment of this customer.

C1.5.6. Estimates of expected credit losses - Collective analysis

Transactions that are not subject to an individual impairment analysis are grouped considering their risk characteristics and subject to a collective impairment analysis. The Group's credit portfolio is divided by internal risk grades and according to the following segments:

- a) Segments with a reduced history of defaults, designated 'low default': Large corporate exposures, Project finance, Institutions (banks/financial institutions) and Sovereigns;
- b) Segments not 'low default': - Retail: Mortgages; Overdrafts; Credit cards; Small and medium enterprises - Retail ('SME Retail'); and Others - Corporate: Small and medium enterprises - Corporate ('Large SME'); and Real Estate.

The Group performs statistical tests in order to prove the homogeneity of the segments mentioned above, with a minimum period of one year.

Expected credit losses are estimates of credit losses that are determined as follows:

- financial assets with no signs of impairment at the reporting date: the present value of the difference between the contractual cash flows and the cash flows that the Group expects to receive;
- financial assets with impairment at the reporting date: the difference between the gross book value and the present value of the estimated cash flows;
- unused credit commitments: the present value of the difference between the resulting contractual cash flows if the commitment is made and the cash flows that the Group expects to receive;
- financial guarantees: the current value of the expected repayments less the amounts that the Group expects to recover.

The main inputs used to measure ECLs on a collective basis should include the following variables:

- Probability of Default – PD;
- Loss Given Default – LGD; and,
- Exposure at Default – EAD.

These parameters are obtained through internal statistical models and other relevant historical data, considering the already existing regulatory models adapted to the requirements of IFRS 9.

PDs are estimated based on a certain historical period and will be calculated based on statistical models. These models are based on internal data including both quantitative and qualitative factors. If there is a change in the risk of the counterparty or exposure, the estimate of the associated PD will also vary. The PDs will be calculated considering the contractual maturities of exposures.

The risk grades are a highly relevant input for determining the PD associated with each exposure.

The Group collects performance and default indicators about their credit risk exposures with analysis by types of customers and products.

LGD is the magnitude of the loss that is expected to occur if an exposure goes into default. The Group estimates the LGD parameters based on the historical recovery rates after entry into counterparty defaults. The LGD models consider the associated collaterals, the counterparty activity sector, the default time, as well as the recovery costs. In the case of contracts secured by real estate, it is expected that the LTV (loan-to-value) ratios are a parameter of high relevance in the determination of LGD.

The EAD represents the expected exposure if the exposure and/or customer defaults. The Group obtains the EAD values from the counterparty's current exposure and potential changes to its current value as a result of the contractual conditions, including amortisations and prepayments. For commitments and financial guarantees, the value of the EAD will consider both the amount of credit used and the expectation of future potential value that may be used in accordance with the agreement.

As described above, except for financial assets that consider a 12-month PD as they do not present a significant increase in credit risk, the Group will calculate the ECL value considering the risk of default during the maximum contractual maturity period of the contract, even if, for the purpose of risk management, it is considered to be a longer period. The maximum contractual period shall be considered as the period up to the date on which the Group has the right to require payment or end the commitment or guarantee.

The Group conservatively considers a residual term of 5 years in the case of renewable operations, when in stage 2. This term was determined based on the behavioural models of this type of product applied by the Group in the liquidity risk and interest rate analysis.

The Group uses models to forecast the evolution of the most relevant parameters for the expected credit losses, namely probability of default, which incorporate forward-looking information. This incorporation of forward-looking information is carried out in the relevant elements considered for the calculation of expected credit losses (ECL).

In particular, the PD point-in-time (PDpit) considered for the determination of the probability of performing exposures at the reference date becoming defaulted exposures considers the expected values for a set of macroeconomic variables, based on three scenarios (Central, Upside and Downside Scenario) prepared by the Group's Economic Studies area. These scenarios, which are used across the Group for various purposes besides calculating impairment, consider existing forecasts by reference entities.

In December 2024 the Group carried out an update of the macroeconomic scenarios and of the corresponded adjustment of the parameters considered in the collective impairment model.

C2. Financial liabilities

C2.1. Classification, initial recognition and subsequent measurement

At initial recognition, financial liabilities are classified in one of the following categories:

- “Financial liabilities at amortised cost”;
- “Financial liabilities at fair value through profit or loss”.

C2.1.1. Financial liabilities at fair value through profit or loss

Classification

Financial liabilities classified under “Financial liabilities at fair value through profit or loss” include:

- a) “Financial liabilities held for trading”

In this balance the issued liabilities are classified with the purpose of repurchasing in the near term, those that form part of a portfolio of identified financial instruments that are managed together and for which there is evidence of a recent actual pattern of short-term profit-taking; or is a derivative (except for a derivative classified as hedging instrument).

- b) “Financial liabilities designated at fair value through profit or loss”

The Group may irrevocably assign a financial liability at fair value through profit or loss at the time of its initial recognition if at least one of the following conditions is met:

- the financial liability is managed, evaluated and reported internally at its fair value; or,
- the designation eliminates or significantly reduces the accounting mismatch of transactions.

Initial recognition and subsequent measurement

Considering that the transactions carried out by the Group in the normal course of its business are made in market conditions, financial liabilities at fair value through profit or loss are initially recognised at fair value with the costs or income associated with the transactions recognised in profit or loss at the initial moment.

Subsequent changes in the fair value of these financial liabilities are recognised as follows:

- the amount of change in the fair value of the financial liability that is attributable to changes in the credit risk of that liability shall be presented in other comprehensive income;
- the remaining amount of change in the fair value of the liability shall be presented in profit or loss.

The accrual of interest and the premium/discount (when applicable) is recognised in "Interest and similar expense" based on the effective interest rate of each transaction.

C2.1.2. Financial guarantees

If they are not designated at fair value through profit or loss at the time of initial recognition, the financial guarantee contracts are subsequently measured at the highest of the following amounts:

- the provision for losses determined according to the criteria described in note C1.5;
- the amount initially recognised deducted, when appropriate, from the accumulated amount of income recognised according to IFRS 15 - Revenue from contracts with customers.

Financial guarantee contracts that are not designated at fair value through profit or loss are presented under "Provisions".

C2.1.3. Financial liabilities at amortised cost*Classification*

Financial liabilities that were not classified at fair value through profit or loss, or correspond to financial guarantee contracts, are measured at amortised cost.

The category "Financial liabilities at amortised cost" includes deposits from credit institutions and other funds, deposits from customers and other funds, as well as subordinated and non-subordinated debt securities.

Initial recognition and subsequent measurement

Financial liabilities at amortised cost are initially recognised at fair value plus transaction costs and are subsequently measured at amortised cost. Interest on financial liabilities at amortised cost are recognised in "Interest and similar expense", based on the effective interest rate method.

C2.2. Reclassification between categories of financial liabilities

Reclassifications of financial liabilities are not allowed.

C2.3. Derecognition of financial liabilities

The Group derecognises financial liabilities when these are cancelled or extinct.

C3. Interest recognition

Income and expense related to interest from financial instruments measured at amortised cost are recognised in "Interest and similar income" and "Interest and similar expense" (net interest income) through the effective interest rate method. Interest related to financial assets at fair value through other comprehensive income is also recognised in net interest income.

The effective interest rate is the rate that discounts estimated future cash payments or receipts through the expected life of the financial instrument (or, when appropriate, for a shorter period), to the net carrying amount of the financial asset or financial liability.

For calculating the effective interest rate, the Group estimates future cash flows considering all contractual terms of the financial instrument (e.g., early payment options) but without considering future impairment losses. The calculation includes all fees paid or received considered as included in the effective interest rate, transaction costs and all other premiums or discounts directly related to the transaction, except for assets and liabilities at fair value through profit and loss.

Interest income recognised in income associated with contracts classified in stage 1 or 2 are determined by applying the effective interest rate for each contract on its gross book value. The gross balance of a contract is its amortised cost, before deducting the respective impairment. For financial assets included in stage 3, interest is recognised in the income statement based on its net book value (less impairment). The interest recognition is always made in a prospective way, i.e., for financial assets entering stage 3, interest is recognised at the amortised cost (net of impairment) in subsequent periods.

For purchased or originated credit-impaired assets (POCI), the effective interest rate reflects the expected credit losses in determining the expected future cash flows receivable from the financial asset.

C4. Hedge accounting

As allowed by IFRS 9, the Group opted to continue to apply the hedge accounting requirements in accordance with IAS 39.

The Group designates derivatives and other financial instruments to hedge its exposure to interest rate and foreign exchange risk, resulting from financing and investment activities. Derivatives that do not qualify for hedge accounting are accounted for as trading instruments.

Derivative hedging instruments are stated at fair value and gains and losses on revaluation are recognised in accordance with the hedge accounting model adopted by the Group. A hedge relationship exists when:

- at the inception of the hedge there is formal documentation of the hedge;
- the hedge is expected to be highly effective;
- the effectiveness of the hedge can be reliably measured;
- the hedge is assessed in a continuous basis and highly effective throughout the reporting period; and,
- for hedges of a forecasted transaction, the transaction is highly probable and presents an exposure to variations in cash flows that could ultimately affect profit or loss.

When a derivative financial instrument is used to hedge foreign exchange variations arising from monetary assets or liabilities, no hedge accounting model is applied. Any gain or loss associated to the derivative is recognised through profit and loss, as well as changes in currency risk of the monetary items.

C4.1. Fair value hedge

Changes in the fair value of derivatives that are designated and qualify as fair value hedge instruments are recognised in profit and loss, together with changes in the fair value attributable to the hedged risk of the asset or liability or group of assets and liabilities. If the hedge relationship no longer meets the criteria for hedge accounting, the cumulative gains and losses due to variations of hedged risk linked to the hedge item recognised until the discontinuance of the hedge accounting are amortised through profit and loss over the residual term of the hedged item.

C4.2. Cash flow hedge

In a hedge relationship, the effective portion of changes in fair value of derivatives that are designated and qualify as cash flow hedges are recognised in equity - cash flow hedge reserves in the effective part of the hedge relations. Any gain or loss relating to the ineffective portion of the hedge is immediately recognised in profit and loss when occurred.

Amounts accumulated in equity are reclassified to profit and loss in the periods in which the hedged item will affect profit or loss.

In case of hedging variability of cash flows, when the hedge instrument expires or is disposed or when the hedging relationship no longer meets the criteria for hedge accounting, or when the hedge relation is revoked, the hedge relationship is discontinued on a prospective basis. Therefore, the fair value changes of the derivative accumulated in equity until the date of the discontinued hedge accounting can be:

- deferred over the residual period of the hedged instrument; or,
- recognised immediately in results if the hedged instrument is extinguished.

In the case of a discontinued hedge of a forecast transaction, the change in fair value of the derivative recognised in equity at that time remains in equity until the forecasted transaction is ultimately recognised in the income statement. When a forecasted transaction is no longer expected to occur, the cumulative gain or loss that was reported in equity is immediately transferred to profit and loss.

C4.3. Hedge effectiveness

For a hedge relationship to be classified as such according to IAS 39, effectiveness must be demonstrated. As such, the Group performs prospective tests at the beginning date of the initial hedge, if applicable, and retrospective tests in order to demonstrate at each reporting period the effectiveness of the hedging relationships, demonstrating that the variations in fair value of the hedging instrument are hedged by the fair value variations of the hedged item in the portion assigned to the risk covered. Any ineffectiveness is recognised immediately in profit and loss when incurred.

C4.4. Hedge of a net investment in a foreign operation

Hedges of net investments in foreign operations are accounted for similarly to cash flow hedges. Any exchange gain or loss on the hedging instrument relating to the effective portion of the hedge is recognised in equity. The gain or loss relating to the ineffective portion is immediately recognised in profit and loss. Gains and losses accumulated in equity related to the investment in a foreign operation and to the associated hedge operation are recognised in equity and transferred to profit and loss, on the disposal of the foreign operation as part of the gain or loss from the disposal.

C5. Embedded Derivatives

An embedded derivative is a component of a hybrid agreement, which also includes a non-derived host instrument.

If the main instrument included in the hybrid contract is considered a financial asset, the classification and measurement of the entire hybrid contract is carried out in accordance with the criteria described in note C1.1.3.

Derivatives embedded in contracts that are not considered financial assets are treated separately whenever the economic risks and benefits of the derivative are not related to those of the main instrument, since the hybrid instrument is not initially recognised at fair value through profit or loss. Embedded derivatives are recorded at fair value with subsequent fair value changes recorded in profit or loss for the period and presented in the trading derivatives portfolio.

D. Securitization operations

D1. Traditional securitizations

As at 30 September 2025, Banco Comercial Português has in Portugal two residential mortgage credit securitization operations, Magellan Mortgages no.3 and no.4, in which the respective portfolios were derecognised from the Bank's individual balance sheet, as the risks and rewards related to the residual portions of the referred transactions, were transferred to institutional investors.

By purchasing a part or all of the most subordinated residual portion, the Group maintained control of the assets and liabilities of Magellan Mortgages no.3, this Special Purpose Entity (SPE) being consolidated in the Group's financial statements, in accordance with the accounting policy referred to in note 1 B.

The two operations are traditional securitizations, where each mortgage loan portfolio was sold to a Portuguese Loan Securitisation Fund, which has financed this purchase through the sale of securitisation units to an Irish-SPE. At the same time, this Special Purpose Entity (SPE) issued and sold in capital markets the different tranches of bonds.

D2. Synthetic securitizations

As at 30 September 2025, Banco Comercial Português has in Portugal four synthetic securitization operations, with similar characteristics, with reference to credit portfolios granted by the Bank mainly to Small and Medium Enterprises (SMEs).

Caravela SME no.3, which started on 28 June 2013, has a medium and long-term loan portfolio of current accounts and authorized overdrafts.

Caravela SME no.4, initiated on 5 June 2014, has a reference portfolio of vehicle, real estate and equipment leasing.

Caravela SME no.5, initiated on 20 December 2022, is supported on a credit portfolio of medium-and-long-term loans, leasing contracts and commercial paper programmes.

Caravela SME no.6, initiated on 28 February 2024, is supported on a credit portfolio of short-term exposures to Corporate customers, in the form of current accounts overdrafts, authorised overdrafts and confirming agreements.

In any of these operations, the Bank contracted a Credit Default Swap (CDS) from a Special Purpose Entity (SPE), buying, this way, protection over the total referenced portfolio. As in all synthetic securitizations, under CDS, the risk of the respective portfolios was divided in 3 tranches: senior, mezzanine and equity.

In the case of both Caravela no.3 and no.4, the mezzanine and part of the equity (20%) were placed in the market through the issuance of Credit Linked Notes (CLNs) by the above mentioned SPE which were subscribed by investors, while the Group retained the senior risk and the remaining part of the equity (80%). In the case of Caravela, SME no. 5 and no.6, only the full amount of the mezzanine was placed in the market, while the Group retained the risk of the full amount of the senior and equity tranches.

Note that in all the above-mentioned synthetic transactions, the product of the CLNs issue was invested by the SPE in a deposit, which fully collateralizes the responsibilities in the presence of its creditors including BCP in accordance with the CDS.

E. Equity instruments

A financial instrument is an equity instrument only if: i) the instrument includes no contractual obligation to deliver cash or another financial asset to another entity or to exchange financial assets or financial liabilities with another entity under conditions that are potentially unfavourable to the entity; and, ii) the instrument will or may be settled in the issuer's own equity instruments, it is either a non-derivative that includes no contractual obligation for the issuer to deliver a variable number of its own equity instruments or a derivative that will be settled only by the issuer exchanging a fixed amount of cash or another financial asset for a fixed number of its own equity instruments.

An equity instrument, independently from its legal form, evidences a residual interest in the assets of an entity after deducting all its liabilities.

Transaction costs directly attributable to an equity instrument issuance are recognised in equity as a deduction to the amount issued. Amounts paid or received related to sales or acquisitions of equity instruments are recognised in equity, net of transaction costs.

Preference shares issued by the Group are considered as an equity instrument when redemption of the shares is solely at the discretion of the Group and dividends are paid at the discretion of the Group.

Income from equity instruments (dividends) are recognised when the obligation to pay is established and are deducted to equity.

F. Securities borrowing and repurchase agreement transactions

F1. Securities borrowing

Securities lent under securities lending arrangements continue to be recognised in the balance sheet and are measured in accordance with the applicable accounting policy. Cash collateral received in respect of securities lent is recognised as a financial liability. Securities borrowed under securities borrowing agreements are not recognised. Cash collateral placements in respect of securities borrowed are recognised under loans and advances to either banks or customers. Income and expenses arising from the securities borrowing and lending business are recognised on an accrual basis over the period of the transactions and are included in interest income or expense (net interest income).

F2. Repurchase agreements

The Group performs acquisition/sale of securities under reselling/repurchase agreements of securities substantially equivalent in a future date at a predetermined price ('repos'/'reverse repos'). The securities related to reselling agreements in a future date are not recognised in the balance sheet. The amounts paid are recognised in loans and advances to customers or loans and advances to credit institutions. The receivables are collateralised by the related securities. Securities sold through repurchase agreements continue to be recognised in the balance sheet and are revaluated in accordance with the applicable accounting policy. The amounts received from the proceeds of these securities are considered as Deposits from customers and other funds or Deposits from credit institutions and other funds. The difference between the acquisition/sale and reselling/repurchase conditions is recognised on an accrual basis over the period of the transaction and is included in interest income or expenses.

G. Non-current assets held for sale and Discontinued or discontinuing operations

Non-current assets, groups of non-current assets held for sale (groups of assets together with related liabilities that include at least a non-current asset) and discontinued operations are classified as held for sale when the intention is to sell the referred assets and liabilities and when the referred assets or group of assets are available for immediate sale, subject to the terms of sale usually applicable to these types of assets, and its sale is highly probable, in accordance with IFRS 5. For the sale to be considered highly probable, the Group must be committed to a plan to sell the asset (or disposal group) and must have initiated an active program to locate a buyer and complete the plan. In addition, the asset (or disposal group) must be actively marketed for sale at a price that is reasonable in relation to its current fair value. Furthermore, it should be expected that the sale qualifies for recognition as a completed sale within one year from the date of classification, except as permitted by paragraph 9 of IFRS 5, and that the Group remains committed to the asset sales plan and the delay is caused by events or circumstances beyond its control.

If the requirements set out in IFRS 5 for these assets are not met, the balance sheet value and respective impairment are reflected in the balance "Other assets".

The Group also classifies as non-current assets held for sale those non-current assets or groups of assets acquired exclusively with a view to its subsequent disposal, which are available for immediate sale and its sale is highly probable. Immediately before classification as held for sale, the measurement of the non-current assets or all assets and liabilities in a disposal group, is performed in accordance with the applicable IFRS. After their reclassification, these assets or disposal groups are measured at the lower of their cost and fair value less costs to sell.

Discontinued operations and the subsidiaries acquired exclusively with the purpose to sell in the short-term are consolidated until the moment of their sale.

G1. Non-operating real estate (INAE)

The Group also classifies as non-current assets held for sale the non-operating real estate (INAE), which include properties acquired by the Group as a result of the resolution of customer credit processes, as well as own properties that are no longer used by the Group's services.

Properties held by real estate companies and real estate investment funds, which are part of the Group's consolidation perimeter, whose capital or units acquired by the Group as a result of the recovery loans are treated as INAE.

At the time of acquisition, real estate classified as INAE is recognised at the lower of the value of the loans existing on the date on which the recovery occurs, or the judicial decision is formalised, and the fair value of the property, net of estimated costs for sale. Subsequent measurement of INAE is made at the lower of their book value and the corresponding fair value, net of the estimated costs for their sale and are not subject to amortisation. Impairment losses are recorded in the results of the period in which they arise.

The fair value is determined based on the market value, which is determined based on the expected sales price obtained through periodic evaluations made by expert external evaluators accredited to the Comissão do Mercado de Valores Mobiliários (CMVM).

The principles used to determine the net fair value of selling costs of a property apply, whenever possible, to real estate like INAE held by Real Estate Companies and Real Estate Investment Funds for the purpose of consolidating Group accounts.

Whenever the net fair value of the selling costs calculated for an INAE is less than the amount by which the same is recognised in the Group's balance sheet, an impairment loss is recorded in the amount of the decrease in value ascertained. Impairment losses are recorded against income for the year.

If the net fair value of the selling costs of an INAE, after recognition of impairment, indicates a gain, the Group may reflect that gain up to the maximum of the impairment that has been recorded on that property.

H. Lease transactions (IFRS 16)

This standard establishes the requirements regarding the scope, classification/recognition and measurement of leases:

- from the lessor's perspective, leases will continue to be classified as finance leases or operating leases;
- from the lessee's perspective, the standard defines a single model of accounting for lease contracts, which results in the recognition of a right-of-use asset and a lease liability for all leases, except for those which the lease term ends within 12 months or for those which the underlying asset is of low-value and, in these cases, the lessee may opt for the exemption from recognition under IFRS 16 and shall recognise the lease payments associated with these leases as an expense.

The Group chose not to apply this standard to short-term lease contracts, i.e. contracts with a term shorter than or equal to one year, and to lease contracts in which the underlying asset's value is below EUR 5,000. Additionally, this standard was not applied to leases of intangible assets.

Lease definition

The lease definition focuses on the control of the identified asset, establishing that a contract constitutes or contains a lease if it carries the right to control the use of an identified asset, i.e., the right to obtain substantially all the economic benefits of using it, and the right to choose how to use the identified asset over a period in exchange of a payment.

Impacts from the lessee's perspective

The Group recognises for all leases, except for those with a term under 12 months or for leases of low-value assets:

- a right-of-use asset initially measured at cost must consider the Net Present Value (NPV) of the lease liability plus the value of payments made (fixed and/or variable), deducted from any lease incentives received, penalties for terminating the lease (if reasonably certain), as well as any cost estimates to be supported by the lessee with the dismantling and removal of the underlying asset and/or with the recovery of its location. Subsequently, it will be measured according to the cost model (subject to depreciations/amortisations and impairment tests);
- a lease liability initially recorded at the present value of the remaining lease payments (NPV), which includes:
 - fixed payments deducted from any lease incentives receivable;
 - variable lease payments that depend on a rate or an index, initially measured considering the rate or index as at the commencement date;
 - amounts expected to be paid by the lessee under residual values guarantees;
 - the exercise price of a purchase option, if the lessee is reasonably certain to exercise that option;
 - payments of penalties for terminating the lease, if the lease term reflects the lessee exercising an option to end the lease.

Since it is not possible to easily determine the implicit interest rate in the lease (paragraph 26 of IFRS 16), lease payments are discounted according to the lessee's incremental borrowing rate, which embodies the risk-free rate curve (swap curve) plus the Group's spread of risk, applied over the weighted average term of each lease contract. For term contracts, that date is considered as the end of lease date, while for contracts without term, or with renewable terms, it is assessed using the date in which the contract is enforceable, as well as eventual economic penalties associated with the lease contract. In the evaluation of enforceability, the particular clauses of the contracts are considered, as well as the current law on Urban Leases.

Subsequently, lease payments are measured as follows:

- by increasing their carrying amount to reflect interest;
- by reducing their carrying amount to reflect lease payments;
- carrying amount shall be remeasured to reflect any leases' revaluations or changes, as well as to reflect the review of in-substance fixed payments and the review of the lease term.

The Group remeasures the lease liability (and makes a corresponding adjustment to the right-of-use asset) whenever:

- the lease term has changed or there is a change in the assessment of exercise of a purchase option, in which case the lease liability is remeasured by discounting the revised lease payments using the revised discount rate;
- the lease payments change due to changes in an index or rate or a change in expected payment under a guaranteed residual value, in which cases the liability is remeasured by discounting the revised lease payments using the initial discount rate (unless the lease payments change is due to a change in a floating interest rate, in which case a revised discount rate is used);
- a lease contract is modified, and the lease modification is not accounted for as a separate lease, in which case the lease liability is remeasured by discounting the revised lease payments using the revised discount rate.

The Group did not make any adjustment during the periods presented.

Right-of-use assets are depreciated over the shorter period of lease term and useful life of the underlying asset. If the lease transfers ownership of the underlying asset or the cost of the right-of-use asset reflects that the Group expects to exercise a purchase option, the related right-of-use asset is depreciated over the useful life of the underlying asset. The depreciation starts at the commencement date of the lease.

The implementation of this standard implies changes in the Group's financial statements, namely:

- in the consolidated income statement:
 - (i) recording in "Interest Income" the interest expenses related to lease liabilities;
 - (ii) recording in "Other administrative costs" the amounts related to short-term lease contracts and to lease contracts of low-value assets; and,
 - (iii) recording in "Amortisations and depreciations" the depreciation expenses related to right-to-use assets.
- in the consolidated balance sheet:
 - (i) recording in "Financial assets at amortised cost – Loans and advances to customers" the recognition of financial assets related to sublease operations measured accordingly to IFRS 9;
 - (ii) recording in "Other tangible assets" the recognition of right-to-use assets; and,
 - (iii) recording in "Other liabilities" the amount of recognised lease liabilities.
- in the consolidated statement of cash flows, the balance "Cash flows arising from operating activities – Payments (cash) to suppliers and employees" includes amounts related to short-term lease contracts and to lease contracts of low-value assets, and the balance "Cash flows arising from financing activities - Decrease in other sundry liabilities and non-controlling interests" includes amounts related to payments of lease liabilities' capital portions, as detailed in the consolidated statement of cash flows.

Impact from the lessor's perspective

In accordance with IFRS 16, paragraph 62, lessors shall classify leases as finance or operational leases.

A lease is classified as a finance lease if it transfers substantially all the risks and rewards inherent to ownership of an underlying asset. A lease is classified as an operating lease if it does not transfer substantially all the risks and rewards inherent to ownership of an underlying asset.

Subleases

A sublease implies that the lessee establishes a lease contract with a third party, which acts as an intermediary, and the lease contract with the original lessor is kept in force.

IFRS 16 – Leases requires that the lessor evaluates subleases regarding right-to-use and not regarding the underlying asset.

The sublease's lessor, simultaneously lessee regarding the original lease, shall recognise an asset in the financial statement – a right-to-use related to the initial lease (if the lease is classified as operating) or a financial asset, measured according to IFRS 9, related to the sublease (if the lease is classified as financing).

In case the primary lease is short-term, then the sublease should be classified as an operating lease.

I. Recognition of income from services and commissions

In accordance with IFRS 15, the Group recognises revenue associated with services and commissions when (or as) a performance obligation is satisfied when transferring a service, based on the transaction price associated with this performance obligation. In this context, the Group takes the following steps to recognise revenue associated with services and commissions:

- Recognition (satisfaction of the performance obligation): (i) identification of the contract associated with the service provided and whether it should be covered by IFRS 15; (ii) identification of performance obligations associated with each contract; (iii) definition of the criteria for the fulfilment of performance obligations, also considering the contractual terms established with the counterparty. According to this definition, a service is transferred when the customer obtains the benefits and control associated with the service provided. In this context, the Group also identifies whether performance obligations are met over time ("over time") or at an exact moment ("point in time"), with revenue being recognised accordingly.

- Measurement (price to be recognised associated with each performance obligation): (i) determine the transaction price associated with the service provided, considering the contractual terms established with the counterparty and its usual commercial practices. The transaction price is the amount of consideration to which the Group expects to be entitled in exchange for transferring promised services to the customer, excluding amounts collected on behalf of third parties. The Group includes in the transaction price part or all of the estimated amount of the variable consideration associated with a performance obligation, only to the extent that it is highly probable that a significant reversal in the amount of the accrued revenue recognised will not occur when the uncertainty associated with that variable consideration is subsequently resolved; and (ii) allocate the transaction price to each of the performance obligations identified under the contract established with the customer.

It should be noted that when services or commissions are an integral part of the effective interest rate of a financial instrument, income resulting from services and commissions is recorded in net interest income (note C.3).

J. Gains/(losses) on financial operations at fair value through profit or loss, Foreign exchange gains/(losses), Gains/(losses) on hedge accounting and Gains/(losses) arising from derecognition of financial assets and liabilities not measured at fair value through profit or loss

These balances include gains and losses on financial assets and liabilities at fair value through profit and loss, i.e., fair value changes and interest on trading derivatives and embedded derivatives, as well as the corresponding dividends received. This balance also includes the gains and losses on sale of financial assets at fair value through other comprehensive income and financial assets and financial liabilities at amortised cost. The changes in fair value of hedging derivatives and hedged items, when fair value hedge is applicable, are also recognised in this balance, as well as the foreign exchange gains or losses.

K. Fiduciary activities

Assets held in the scope of fiduciary activities are not recognised in the Group's consolidated financial statements. Fees and commissions arising from this activity are recognised in the income statement in the period in which they occur.

L. Other tangible assets

Other tangible assets are stated at acquisition cost less accumulated depreciation and impairment losses. Subsequent costs are recognised as a separate asset only when it is probable that future economic benefits will result for the Group. All other repairs and maintenance expenses are charged to the income statement during the financial period in which they are incurred, under the principle of accrual-based accounting.

Depreciation is calculated on a straight-line basis, over the following periods which correspond to their estimated useful life:

	Number of years
Buildings	50
Expenditure on freehold and leasehold buildings	10
Equipment	4 to 12
Other tangible assets	3

Whenever there is an indication that a fixed tangible asset might be impaired, its recoverable amount is estimated and an impairment loss shall be recognised if the net value of the asset exceeds its recoverable amount. The recoverable amount is determined as the highest between the fair value less costs to sell and its value in use calculated based on the present value of future cash flows estimated to be obtained from the continued use of the asset and its sale at the end of the useful life. The impairment losses of the fixed tangible assets are recognised in the income statement of the period.

M. Investment properties

Real estate properties owned by the Group are recognised as 'Investment properties' considering that the main objective of these buildings is their capital appreciation on a long-term basis and not their sale in a short-term period, nor their maintenance for own use.

These investments are initially recognised at their acquisition cost, including transaction costs, and subsequently revaluated at their fair value. The fair value of investment properties should reflect the market conditions at the balance sheet date. Changes in fair value are recognised in the income statement, as "Other operating income/(expenses)" (note 6).

The experts responsible for the valuation of the assets are properly certified for that purpose, being registered in CMVM.

N. Intangible assets

N1. Research and development expenditure

The Group does not capitalise any research and development costs. All expenses are recognised as costs in the period in which they occur.

N2. Software

The Group recognises as intangible assets the costs associated to software acquired from external entities and depreciates them on a straight-line basis by an estimated lifetime of 6 years. The Group does not capitalise internal costs arising from software development.

O. Cash and cash equivalents

For the purposes of the cash flow statement, the balance "Cash and cash equivalents" comprises balances with a maturity of less than three months from the date of acquisition, where "Cash", "Cash and deposits at Central Banks" and "Loans and advances to credit institutions" are included.

P. Offsetting

Financial assets and liabilities are offset and recognised at their net book value when: i) the Group has a legal right to offset the amounts recognised and transactions can be settled at their net value; and, ii) the Group intends to settle on a net basis or realize the asset and settle the liability simultaneously. Considering the current operations of the Group, no compensation of material amount is made. In case of reclassification of comparative amounts, the provisions of IAS 1.41 are disclosed: i) the nature of the reclassification; ii) the amount of each item (or class of items) reclassified; and, iii) the reason for the reclassification.

Q. Foreign currency transactions

Transactions in foreign currencies are converted into the respective functional currency of the operation at the foreign exchange rate on the date of the transaction. Monetary assets and liabilities denominated in foreign currencies are converted into the respective functional currency of the operation at the foreign exchange rate on the reporting date. Foreign exchange differences arising from conversion are recognised in the income statement. Non-monetary assets and liabilities denominated in foreign currencies, which are stated at historical cost, are converted into the respective functional currency of the operation at the foreign exchange rate on the date of the transaction. Non-monetary assets and liabilities denominated in foreign currencies that are stated at fair value are converted into the respective functional currency of the operation at the foreign exchange rate on the date that the fair value was determined against profit and loss, except for financial assets at fair value through other comprehensive income, for which the difference is recognised against equity.

R. Employee benefits

R1. Defined benefit plans

The Group has the responsibility to pay its employees' retirement pensions, invalidity pensions and survivor's pensions for their death, in accordance with the terms of the two collective labour agreements approved. These benefits are provided for in the pension plans 'Plano ACT' and 'Plano ACTQ' of the Banco Comercial Português Group Pension Fund.

Following the publication of Decree-Law no. 54/2009, of 2 March, banking entities are obligatorily enrolling new employees in the General Social Security System (RGSS). These employees have the RGSS as their basic retirement scheme, and do not have any benefits under the ACT (base plan). Under the scope of its management and human resources, the Group had already adopted as a rule the inclusion of new employees in the RGSS since July 2005. However, until the transposition into the ACT of the alterations resulting from the referred Decree-Law no. 54/2009, all employees were covered by the provisions of the social security chapter of the ACT, and for employees who were already registered with the RGSS, the ACT benefit worked as a complement to the RGSS. As of 1 July 2009, in accordance with the ACT, all new employees only have the RGSS as their basic social security scheme.

Until 2011, in addition to the benefits provided for in the two plans above-mentioned, the Group had assumed the responsibility, if certain conditions of profitability were verified in each year, of assigning retirement supplements to the Group's employees hired up to 21 September 2006 (Complementary Plan). The Group, at the end of 2012, determined the extinction (cut) of the old-age benefit of the Complementary Plan. On 14 December 2012, Instituto de Seguros de Portugal (ISP) formally approved this change to the Group's benefit plan, effective from 1 January 2012. The plan was cut, and employees were given individual acquired rights. On that date, the Group also proceeded to the settlement of the respective liability.

From 1 January 2011, Bank employees were integrated in the General Social Security Scheme which now covers their maternity, paternity, adoption and pension benefits. However, the banks remain liable for benefits that concern illness, disability and life insurance (Decree-Law no. 1-A/2011, of 3 January).

The contributory rate is 26.6% divided between 23.6% supported by the employer and 3% supported by the employee, replacing the Banking Social Healthcare System which was extinguished by the decree law referred above. As a consequence of this amendment the capability to receive pensions by the actual employees are covered by the General Social Security Scheme regime, considering the service period between 1 January 2011 and the retirement age. The banks support the remaining difference for the total pension assured in the Collective Labour Agreement (ACT).

This integration has led to a decrease in the present value of the total benefits reported to the retirement age to be borne by the Pension Fund, and this effect is to be recorded in accordance with the Projected Unit Credit during the average lifetime of the pension until the normal retirement age is reached. The calculation of the liability for pensions carried out periodically by the actuary considers this effect and is calculated considering the actuarial assumptions in force, ensuring that the liabilities calculated as at 31 December 2010, not considering the effect of the integration of bank employees into the General Social Security Scheme are fully covered and deducted from the amount of the effect recognised until the date. The component of this effect for the year is recognised under the heading "Current service costs".

Following the approval by the Government of the Decree-Law no. 127/2011, which was published on 31 December, an agreement was established between the Government, the Portuguese Banking Association and the Banking Labour Unions in order to transfer, to the Social Security, the liabilities related to pensions currently being paid to pensioners and retirees, as at 31 December 2011.

This agreement established that the responsibilities to be transferred related to the pensions in payment as at 31 December 2011 at fixed amounts (discount rate 0%) in the component established in the IRCT - Instrument of Collective Regulation of Work of the retirees and pensioners. The responsibilities related to the increase in pensions as well as any other complements, namely, contributions to the Health System (SAMS), death benefit and death before retirement benefit continued to be under the responsibility of the Financial Institutions.

At the end of December 2016, a revision of the ACT was reached between the BCP Group and four unions from the two union federations of the unions that represent the Group's employees, which introduced changes in the Social Security clause and consequently in the pension plan financed by the BCP Group Pension Fund. The new ACT was published by the Ministry of Labour in the Bulletin of Labour and Employment on 15 February 2017 and the effects were recorded in the financial statements of 31 December 2016, for employees associated with these four unions.

The negotiation with Sindicato dos Bancários do Norte (SBN), which was also involved in the negotiations of the new ACT, was concluded in April 2017 with the publication of the Bulletin of Labour and Employment, with the effects of this new ACT recorded in the financial statements as at 31 December 2017, for SBN associate employees.

The most relevant changes in the ACT were the change in the retirement age (presumed disability) from 65 years to 66 years and two months in 2016 and the subsequent update of an additional month in each year, which cannot, in any case, be higher than the one in force at any moment in the General Regime of Social Security, the change in the formula for determining the employer's contribution to SAMS and, lastly, the introduction of a new benefit called the End of Career Premium, which replaces the Seniority Premium.

These changes were framed by the Group as a change to the pension plan under the terms of IAS 19, as such had an impact on the present value of the liabilities with services rendered and were recognised in the income statement for the year 2016 under "Staff costs".

In 2017, after the authorization of the Autoridade de Supervisão de Seguros e Fundos de Pensões (ASF - Portuguese Insurance and Pension Funds Supervision Authority), the BCP Group's pension fund agreement was amended. The main purpose of the process was to incorporate into the pension fund the changes introduced in the Group's ACT in terms of retirement benefits, as well as to transfer to the pension fund the responsibilities that were directly chargeable to the company (extra-fund liabilities). The pension fund has a part exclusively for the financing of these liabilities which, in the scope of the fund, is called Additional Complement. The End of Career Premium also became the responsibility of the pension fund under the basic pension plan.

The Group's net obligation in respect of pension plans (defined benefit pensions plan) is calculated on a half year basis on 31 December and 30 June of each year, and whenever there are significant market fluctuations or significant specific events, such as changes in the plan, curtailments or settlements since the last estimation. The responsibilities with past service are calculated using the Projected Unit Credit method and actuarial assumptions considered adequate.

Pension liabilities are calculated by the responsible actuary, who is certified by the ASF.

The Group's net obligation in respect of defined benefit pension plans and other benefits is calculated separately for each plan by estimating the amount of future benefit that employees have earned in return for their service in the current and prior periods. The benefit is discounted to determine its present value, using a discount rate determined by reference to interest rates of high- quality corporate bonds that have maturity dates approximating the terms of the Group's obligations. The net obligations are determined after the deduction of the fair value of the Pension Plan's assets.

The income/cost of interest with the pension plan is calculated by the Group, multiplying the net asset/liability with retirement pension (liabilities less the fair value of the plan's assets) by the discount rate used in the determination of the retirement pension liabilities. On this basis, the income/cost net of interest includes the interest costs associated with retirement pension liabilities and the expected return of the plan's assets, both measured based on the discount rate used to calculate the liabilities.

Gains and losses from the re-measurement, namely (i) actuarial gains and losses resulting from differences between actuarial assumptions used and the amounts actually observed (experienced gains and losses) and changes in actuarial assumptions and (ii) gains and losses arising from the difference between the expected return of the plan's assets and the amounts obtained, are recognised against equity under "Other comprehensive income".

The Group recognises in its income statement a net total amount that comprises (i) the current service cost, (ii) the income/cost net of interest with the pension plan, (iii) the effect of early retirement, (iv) past service costs and, (v) the effects of any settlement or curtailment occurred during the period. The net income/cost with the pension plan is recognised as interest and similar income or interest and similar expense depending on their nature. The costs of early retirements correspond to the increase in liabilities due to the employee's retirement before reaching the age of retirement.

Employee benefits, other than pension plans, namely post-retirement health care benefits and benefits for the spouse and descendants for death before retirement are also included in the benefit plan calculation.

The contributions to the funds are made annually by each company of the Group, according to a specific contribution plan that ensures the solvency of the fund. In the end of each year, according to Banco de Portugal Notice no. 12/2001, the minimum level required for the responsibilities funding must be 100% regarding pension payments and 95% regarding past services of active employees.

R2. Revision of the salary tables for employees in service and pensions in payment

In the third quarter of 2025, negotiations continued with all the unions subscribing to the Group's Collective Labour Agreements, for the conclusion of the full review of the respective clauses, negotiations which are still ongoing.

At the same time, an increase of 2.50% was agreed on 2 January 2025 for salary tables and other pecuniary clauses for the year 2025, with the unions: "SBN – Sindicato dos Trabalhadores do Setor Financeiro de Portugal", "SBC - Sindicato Nacional dos Trabalhadores da Banca, Seguros e Tecnologias" and "Sindicato da Banca, Seguros e Tecnologias - MAIS SINDICATO", within the scope of the mediation process which took place at Government Labour Minister Department "DGERT – Direção-Geral do Emprego e das Relações de Trabalho", and according with the proposal presented by this entity on 23 December 2024 to the parties under mediation.

Negotiations are also taking place with the "SIB – Sindicato Independente da Banca" for the review of salary tables and other pecuniary expression clauses relating to the years 2024 and 2025, as well as negotiations with the "Sindicato Nacional dos Quadros Técnicos Bancários (SNQTB)" for the 2025 review.

R3. Defined contribution plan

For the defined contribution plans, the responsibilities related to the benefits attributed to the Group's employees are recognised as expenses when incurred.

As at 30 September 2025, the Group has two defined contribution plans. One plan covers employees who were hired before 1 July 2009. For this plan, called non-contributory, Group's contributions will be made annually and equal to 1% of the annual remuneration paid to covered employees in the previous year. Contributions shall only be made if the following requirements are met: (i) the Bank's ROE equals or exceeds the rate of government bonds of 10 years plus 5 percentage points, and (ii) distributable profits or reserves exist in the accounts of Banco Comercial Português. As in the year 2024 the indicated requirements were fulfilled a provision for the annual contribution, which was carried out in May 2025, was recorded in the 2024 costs.

The other plan covers employees who have been hired after 1 July 2009. For this plan, designated contributory, monthly contributions will be made equal to 1.5% of the monthly remuneration received by employees in the current month, by the Group and by the employees. This contribution has a mandatory character and is defined in the Collective Labour Agreement of the BCP Group and does not have a performance criterion.

R4. Variable remuneration paid to employees

In the remuneration policy for employees in force it is foreseen an annual variable remuneration system / profit distribution for employees not covered by commercial incentive systems, which is based on the level of results achieved by the Bank and the principle of discretion based on the level of responsibility and contribution of everyone to the Bank's results. Based on this assessment, and provided that a Bank's minimum level of performance, as measured by a set of quantitative indicators, is met, the amount of the variable remuneration to be attributed to each employee is determined.

The Executive Committee is responsible, under the terms defined in the remuneration policy, for setting the respective allocation criteria for each employee, whenever it is attributed. The variable remuneration attributed to employees is recorded against the income statement in the period to which it relates.

R5. Share-based compensation plan

As at 30 September 2025, a variable compensation plan / profit distribution with BCP shares is in force for the members of the Executive Committee and for the employees considered Key Function Holders (includes Key Management Members), resulting from the Remuneration Policy for Employees approved for the year 2025 and the Remuneration Policy for members of the management and supervisory bodies approved for the fiscal year 2025 and following years, with the changes that may be approved in each financial year, namely by the General Shareholders' Meeting regarding the Remuneration Policy for the members of the management and supervisory bodies, and by the Board of Directors regarding the Remuneration Policy for Employees.

Key Function Holders include Key Management Members, which are the first line directors who report directly to the Board of Directors and the remaining employees whose professional activities have a significant impact on the Bank's risk profile.

As defined in the Remuneration Policy for the members of the management and supervisory bodies, an annual variable remuneration / profit distribution system is foreseen, which is based on the level of results achieved by the Bank, and for which a discretion assessment of the performance of the Executive Committee is carried out on an annual basis based on quantitative and qualitative data. According to this assessment and your annual fixed remuneration, and provided that a Bank's minimum level of performance as measured by a set of quantitative indicators is met, the amount of the variable remuneration to be attributed to each members of the Executive Committee is decided by the Remuneration and Welfare Board. The payment of the amount of the variable remuneration attributed is subject to a deferral period of 5 years for 50% of its value, being 50% of its value paid in the year following the financial year in question. For the members with variable remuneration awarded greater than the fixed annual remuneration earned in the financial year in question, 60% of the amount must be deferred. The amounts related to the non-deferred and deferred portion are paid 50% in cash and 50% in BCP shares. The number of BCP shares attributed results from their valuation at a price defined in accordance with the approved Remuneration Policy.

The Remuneration Policy for Employees foresees an annual variable remuneration / profit distribution system for Employees not covered by Commercial Incentives Systems, which is based on the level of results achieved by the Bank and the principle of discretion based on the level of responsibility and contribution of everyone to the Bank's results. As a result of this assessment and the fixed reference remuneration for the function performed, and provided that a Bank's minimum level of performance in a set of quantitative indicators is met, the value of the variable remuneration to be attributed to each Employee is decided by the Executive Committee. For Employees considered as Key Function Holders (KFH), the payment of the amount of the variable remuneration to be attributed to each Employee is decided by the Nominations and Remunerations Committee, and its payment subject to a deferral period of 5 years for 40% of its value, with 60% of its value paid in the year following the financial year in question. For the KFH with variable remuneration awarded greater than the fixed annual remuneration earned in the financial year in question, 60% of the amount must be deferred. The amounts related to the non-deferred and deferred portion are paid 50% in cash and 50% in BCP shares. The number of BCP shares attributed and to be attributed results from their valuation at a price defined in accordance with the approved Remuneration Policy. As provided for in the Remuneration Policy for Employees, if the amount of the annual variable remuneration awarded to a Key Function Holder is less than EUR 50,000 and does not represent more than one third of the total annual remuneration of the Key Function Holder the payment of the annual variable remuneration will be 100% in cash and there will be no deferral.

Employees considered as Key Function Holders are not covered by Commercial Incentives Systems.

For the remaining Employees not covered by Commercial Incentive Systems, the payment of the variable remuneration amount awarded is fully paid in cash in the following year to which it relates.

For the members of the Executive Committee and to the Employees considered as Key Function Holders (KFH), a long-term variable remuneration (LTVR) system is also foreseen, through which these members may receive variable remuneration fully paid in BCP shares after the end of the assessment period, from 1 January 2022 until 31 December 2025 (from 1 January 2023 until 31 December 2025 to the Employees Key Function Holders), provided that a certain level of performance is achieved in a set of long-term objectives. The amount of the long-term variable remuneration attributed is subject to a deferral period of 5 years for 50% of its value, being 50% of its value paid in the year following the assessment period to which it relates. If the LTVR of each member of the Executive Committee or KFH, equal to or greater than the annual fixed remunerations earned in the LTVR valuation period, the deferred amount will correspond to 60%. The number of BCP shares attributed results from their valuation at a price defined in accordance with the approved Remuneration Policy.

All the shares attributed to the members of the Executive Committee and to the Key Function Holders, within the scope of the payment of variable remuneration, including long-term, are subject to a retention period of 1 year after their payment.

The total variable remuneration to be attributed, each year, to each member of the Executive Committee and to the Key Function Holders, regarding the proportion between its amount and the annual fixed remuneration, is limited to the limits provided in the respective Remuneration Policy.

As foreseen in the approved Remuneration Policy and in the applicable legislation, the amounts of variable remuneration attributed to the members of the Executive Committee and to the Employees Key Function Holders are subject to reduction and reversal mechanisms, to be applied in case of verification of extremely significant events, duly identified, in which the people covered have had a direct participation.

S. Income taxes

The Group is subject to income tax in several jurisdictions. The Bank is subject, in individual terms, to the regime established by the Corporate Income Tax Code (CIRC), the Special Regime applicable to Deferred Tax Assets approved by Law no. 61/2014 of 26 August, to which it adhered, and individual legislation. Additionally, deferred taxes relating to tax losses and to temporary differences between the accounting net income and the net income accepted by the Tax Authorities for Income Taxes calculation are accounted for, whenever there is a reasonable probability that these taxes will be paid or recovered in the future.

Income tax recorded in net income for the year comprises current and deferred tax effects. Income tax is recognised in the income statement, except when related to items recognised directly in equity, which implies its recognition in equity. Deferred taxes arising from the revaluation of financial assets at fair value through other comprehensive income and cash flow hedging derivatives are recognised in shareholders' equity and are recognised after in the income statement at the moment the profit and loss that originated the deferred taxes are recognised.

Current tax is the value that determines the taxable income for the year, using tax rates enacted or substantively enacted by authorities at the balance sheet date, and any adjustment to tax payable in respect of previous years.

Deferred taxes are calculated in accordance with the liability method based on the balance sheet, considering temporary differences, between the carrying amounts of assets and liabilities and the amounts used for taxation purposes using the tax rates approved or substantially approved at balance sheet date and that is expected to be applied when the temporary difference is reversed.

Deferred tax liabilities are recognised for all taxable temporary differences except for non-deductible goodwill for tax purposes, differences arising from initial recognition of assets and liabilities that affect neither accounting nor taxable profit and differences relating to investments in subsidiaries to the extent that probably they will not reverse in the foreseeable future.

The item "Deferred tax assets" includes amounts associated with credit impairments not accepted for tax purposes whose credits have been written-off, according to the expectation that the use of such impairments will be deductible for the purposes of determining taxable income for the tax periods in which the legal conditions required for their tax deductibility are met.

Deferred tax assets are recognised when it is probable that there will be future taxable profits that absorb the deductible temporary differences for tax purposes (including reportable tax losses).

The Group, as established in IAS 12, paragraph 74, compensates the deferred tax assets and liabilities if, and only if: (i) it has a legally enforceable right to offset current tax assets and current tax liabilities; and, (ii) the deferred tax assets and the deferred tax liabilities relate to income taxes released by the same Tax Authority on the same taxable entity.

The Group complies with the guidelines of IFRIC 23 – Uncertainty over Income Tax Treatments on the determination of taxable profit, tax bases, tax losses to be reported, tax credits to be used and tax rates in scenarios of uncertainty regarding the income tax treatment, not having occurred any material impact on the Bank's financial statements resulting from its application.

In 2016, the Banco Comercial Português adhered to the Special Tax Regime for Groups of Companies (RETGS) for the purposes of corporate income (IRC) taxation, with BCP being the dominant entity. In the financial years of 2025 and 2024, RETGS application was maintained. The group's taxable profit is calculated by the algebraic sum of taxable profits and individual tax losses of the companies that integrate it.

T. Segmental reporting

The Group adopted IFRS 8 – Operating Segments for the purpose of disclosing financial information by geographic segments, breaking them down into their respective operating segments whenever deemed relevant. A business segment is a Group's component: (i) which develops business activities that can obtain revenues or expenses; (ii) whose operating results are regularly reviewed by the management with the aim of taking decisions about allocating resources to the segment and assess its performance; and (iii) for which separate financial information is available.

The Group controls its activity through the following major operating segments:

Portugal activity:

- Retail Banking, also including ActivoBank;
- Companies and Corporate;
- Private Banking;
- Other.

The Other segment (Portugal activity) includes activities that are not allocated to remaining segments, namely centralized management of financial investments, corporate activities, and insurance activity.

International activity:

- Poland:
 - Retail;
 - Companies and Corporate;
 - Other.
- Mozambique;
- Other.

The contribution of the participation in the associate in Angola is included in the "Other" segment (International activity).

U. Provisions, Contingent liabilities and Contingent assets

U1. Provisions

Provisions are recognised when (i) the Group has a present obligation (legal or resulting from past practices or published policies that imply the recognition of certain responsibilities); (ii) it is probable that a payment will be required to settle; and, (iii) a reliable estimation can be made of the amount of the obligation.

Additionally, when fundamental reorganizations occur that have a material effect on the nature and focus of the company's operations, and the criteria for recognition of provisions referred to above are met, provisions are recognised for restructuring costs.

The measurement of provisions considers the principles set in IAS 37 regarding the best estimate of the expected cost, the most likely result of current actions and considering the risks and uncertainties inherent to the process result. On the cases that the discount effect is material, provision corresponds to the actual value of the expected future payments, discounted at a rate that considers the associated risk of the obligation.

Provisions are reviewed at each balance sheet date and adjusted to reflect the best estimate, being reverted through profit and loss in the proportion of the payments that are not probable.

Provisions are derecognised through their use in the obligations for which they were initially created, or in the case that these obligations cease to exist.

U2. Contingent assets

Contingent assets are not recognised in the financial statements and are disclosed when a future economic inflow of resources is probable.

U3. Contingent liabilities

Contingent liabilities are not recognised in the financial statements, being framed under IAS 37 whenever the possibility of an outflow of resources regarding economic benefits are not remote. The Group records a contingent liability when:

- i) it is a possible obligation that arises from past events and whose existence will be confirmed only by the occurrence or non- occurrence of one or more uncertain future events that are not wholly within the control of the Group; or,
- ii) it is a present obligation that arises from past events but is not recognised because:
 - a) it is not probable that an outflow of resources embodying economic benefits will be required to settle the obligation; or,
 - b) the amount of the obligation cannot be measured with sufficient reliability.

The contingent liabilities identified are subject to disclosure, unless the possibility of an outflow of resources incorporating economic benefits is remote.

V. Earnings per share

Basic earnings per share are calculated by dividing net income attributable to shareholders of the Group by the weighted average number of ordinary shares outstanding, excluding the average number of ordinary shares purchased by the Group and held as treasury shares.

For the diluted earnings per share, the weighted average number of ordinary shares outstanding is adjusted to consider conversion of all dilutive potential ordinary shares. Potential or contingent share issues are treated as dilutive when their conversion to shares would decrease net earnings per share. If the earnings per share are changed because of an issue with premium or discount or other event that changed the potential number of ordinary shares or because of changes in the accounting policies, the earnings per share for all presented periods should be adjusted retrospectively.

W. Insurance contracts

W1. Classification

IFRS 17 is the new accounting standard for insurance contracts, reinsurance contracts and for Investment contracts with discretionary participation features, covering aspects such as recognition and measurement, presentation and disclosure of information, replacing IFRS 4 – Insurance contracts.

The Group issues contracts that include insurance risk, financial risk or a combination of both insurance and financial risk. A contract, in which the Group accepts a significant insurance risk from another party, by agreeing to compensate that party on the occurrence of a specified uncertain future event, is classified as an insurance contract.

A contract issued by the Group without significant insurance risk, but on which financial risk is transferred with discretionary participating features is classified as an investment contract recognised and measured in accordance with the accounting policies applicable to insurance contracts. A contract issued by the Group that transfers only financial risk, without discretionary participating features, is accounted for as a financial instrument.

W2. Recognition and measurement

IFRS 17 defines new principles for recognition, measurement, presentation and disclosure of insurance contracts, reinsurance contracts and Investment contracts with discretionary participation features. The references below apply to these three types of contracts.

In terms of recognition and measurement, insurance contracts are divided into portfolios, annual cohorts and groups of contracts. In the initial recognition, contracts that have similar risk and can be managed together, must be identified, grouping them into portfolios. For measurement purposes, these portfolios are further subdivided into annual cohorts, according to the issuance year. Each of the cohorts, according to the expected future return, is then divided into the following groups: i) contracts that are onerous at initial recognition; ii) contracts that do not present a significant possibility of subsequently becoming onerous; and iii) remaining contracts in the portfolio.

The liability of an insurance contract begins when one of the following conditions is met: i) beginning of the coverage period of the contract, ii) date on which the first payment is made by the insured and this becomes due or iii) in the case of an onerous contract, when it becomes onerous.

IFRS 17 defines 3 measurement models of the insurance liabilities: GMM (General Measurement Model) as a general modal, VFA (Variable Fee Approach) to be applied for investment contracts, which does not include a transfer of significant insurance risk and PAA (Premium Allocation Approach), which can be applied for short term contracts (less than 1 year).

The measurement of the value of a contract is the sum of (except where contracts are being measured using the premium allocation approach): (i) the present value of future cash flows; (ii) a non-financial risk adjustment; and the amount of future profit that is estimated that this contract will generate the Contractual Service Margin (CSM), unless the contract group is onerous. In this case, the estimated loss is recognised immediately.

The liability for future services in contracts measured using the premium allocation approach is based on premiums received, less amounts recognised in profit or loss already incurred in the period.

In terms of the discount rate for determining future cash flows, it should: (i) reflect the time value of money; ii) be consistent with similar ones applied in the market for situations with similar characteristics and iii) exclude the effect of factors that do not affect the future cash flows of the insurance contract.

In the subsequent valuation, the Statement of Financial Position shall include liabilities for insurance contracts, divided into i) liabilities for future services and ii) liabilities for past services. In terms of the Income Statement, it should include: i) income from insurance contracts, ii) expenses from insurance contracts and iii) losses from the financial component of insurance contracts.

W3. Presentation and disclosures

In the Statement of Financial Position should appear in disaggregated form i) insurance contract assets, ii) reinsurance ceded contract assets iii) insurance contracts liabilities and iv) reinsurance ceded contract liabilities.

In terms of the Income Statement, it should be evidenced i) insurance revenue, ii) insurance service expense and iii) Insurance finance result, as well as iv) the net result arising from reinsurance contracts.

Together with the Financial Statements, the standard provides for additional qualitative and quantitative disclosures of i) amounts recognised in the financial statements that fall within the scope of IFRS 17; ii) significant judgments and changes to those judgments made with the application of IFRS 17 and iii) nature and extent of the risks inherent in contracts that fall within the scope of IFRS 17.

For risks falling within the scope of IFRS 17, the entity shall analyse: (i) concentration risk, (ii) sensitivity analysis to the most significant risks, (iii) claims development, (iv) credit risk and (v) liquidity risk.

X. Insurance or reinsurance intermediation services

Banco Comercial Português and Banco ActivoBank are entities authorized by the Insurance and Pension Funds Supervisory Authority (ASF - Autoridade de Supervisão de Seguros e Fundos de Pensões) for the practice of the activity of insurance mediation, in the category of tied Insurance Intermediary, in accordance with article 8(a)(i) of Decree-Law no. 144/2006, of 31 July, developing the activity of insurance intermediation in the life and non-life branches.

Within the scope of insurance mediation services, these Banks sell insurance contracts. As remuneration for the services provided of insurance mediation, they receive commissions for the mediation of insurance contracts and investment contracts, which are defined in agreements/protocols established with the Insurers.

Commissions received by insurance mediation services are recognised in accordance with the accrual principle, so that commissions received at a time other than the period to which it relates are recorded as receivables under "Other assets". Commissions received for insurance mediation services are recognised in accordance with the policy described in note I. Recognition of income from services and commissions.

Y. Accounting estimates and judgments in applying accounting policies

IFRS set forth a range of accounting treatments that require the Board of Directors, under advice of the Executive Committee, to apply judgments and to make estimations when deciding which treatment is the most appropriate. These estimates were made considering the best information available at the date of preparation of the consolidated financial statements, considering the context of uncertainty that results from the current economic scope and the geopolitical conflict in Eastern Europe. The most significant of these accounting estimates and judgments used when applying accounting principles are discussed in this section to improve understanding of how they affect the Group's reported results and related disclosure.

Considering that in some cases there are several alternatives to the accounting treatment chosen by the Board of Directors, under advice of the Executive Committee, the Group's reported results would differ if a different treatment was chosen. The Executive Committee believes that the choices made are appropriate and that the financial statements present the Group's financial position and results fairly in all material relevant aspects.

The alternative outcomes discussed below are presented solely to assist the reader in understanding the financial statements and are not intended to suggest that other alternatives or estimations would be more appropriate.

Y1. Entities included in the consolidation perimeter

For the purposes of determining entities to include in the consolidation perimeter, the Group assesses whether it is exposed to, or has rights to, the variable returns from its involvement with the entity and if it can take possession of these results through the power it holds (*de facto control*). The decision if an entity needs to be consolidated by the Group requires the use of judgment, estimations and assumptions to determine at what extent the Group is exposed to the variable returns and its ability to use its power to affect these returns. Different estimations and assumptions could lead the Group to a different scope of consolidation perimeter with a direct impact in consolidated income.

Y2. Goodwill impairment

The recoverable amount of the goodwill recorded in the Group's assets is assessed annually in the preparation of accounts with reference to the end of the year or whenever there are indications of eventual loss of value. For this purpose, the carrying amount of the business units of the Group for which goodwill has been recognised is compared with the respective recoverable amount. A goodwill impairment loss is recognised when the carrying amount of the business unit exceeds the respective recoverable amount.

In the absence of an available market value, the recoverable amount is determined using cash flows predictions, applying a discount rate that includes a risk premium appropriated to the business unit being tested. Determining the cash flows to discount and the discount rate, involves judgment.

Y3. Income taxes

Interpretations and estimations were required to determine the total amount of income taxes in each of the jurisdictions where the Group operates. There are many transactions and calculations for which the tax determination is uncertain during the ordinary course of business. Different interpretations and estimations could result in a different level of income taxes, current and deferred, recognised in the year.

This aspect assumes greater relevance for the purposes of the analysis of the recoverability of deferred taxes, in which the Group considers forecasts of future taxable income based on a set of assumptions, including the estimate of income before taxes, adjustments to taxable income, evolution of tax legislation and its interpretation. Thus, the recoverability of deferred tax assets depends on the implementation of the Bank's Board of Directors strategy, namely the ability to generate the estimated taxable income, the evolution of tax law and its interpretation.

Regarding the activity in Portugal, the Law no. 98/2019, of 4 September established the tax regime for credit impairments and provisions for guarantees for tax periods beginning on or after 1 January 2019, providing for approximation between the accounting and tax rules for the purposes of deductibility of expenses with the reinforcement of credit impairments. The rules in force until 2018 could continue to be applied until the end of the 2023 financial year, unless the option to apply the new regime was exercised in advance.

In 2022, the Banco Comercial Português, S.A. and the Banco ActivoBank, S.A. exercised the option to apply the new regime, under the terms of which the impairment losses for credit risk relating to exposures analysed on an individual or on a collective basis, the provisions for guarantees and other commitments, and the impairment losses on debt instruments at amortized cost or at fair value through Other Comprehensive Income, recognised in accordance with the applicable accounting standards and regulations are fully deductible for the purposes of determining taxable profit, with the exceptions provided for in the Corporate Income Tax Code. The exceptions apply to impairment losses relating to credits and other rights over natural or legal persons who hold, directly or indirectly, more than 10 % of the Bank's capital, over members of its corporate bodies, over companies in which the Bank holds, directly or indirectly, more than 10 % of the capital or over entities with which it is in a situation of special relations.

The Impairment losses and other value corrections for specific credit risk recorded until 31 December 2021 and still not accepted for tax purposes are only deductible up to the amount that, in each tax period, corresponds to the application of the mandatory minimum limits set out in Notice of Banco de Portugal no. 3/95, as amended before its repeal by Notice of Banco de Portugal no. 5/2015, and, between other conditions, provided that they are not credits covered by real estate rights.

Following the amendments provided for in Law no. 24-D/2022, of 30 December, within the scope of the State Budget for 2023, the time limit applicable to the carrying forward of tax losses in Portugal was eliminated. This amendment applies to tax losses calculated in tax periods beginning on or after 1 January 2023, as well as to tax losses calculated in tax periods prior to 1 January 2023 and whose deduction period is still in progress on that date. Thus, tax losses calculated in 2014 and subsequent years may be deducted from future taxable income. The deduction limit for tax losses went from 70% to 65%, being increased by ten percentage points when the difference results from the deduction of tax losses calculated in the 2020 and 2021 tax periods, under the terms of the special regime provided for in Law no. 27-A/2020, of 24 July.

In the forecasts of future taxable income, namely for purposes of the analysis of the recoverability of deferred taxes assets carried out with reference to 31 December 2024, the approximation between the accounting and tax rules provided for in the aforementioned Law no.º 98/2019, of 4 September, taking into account the option for applying the new regime exercised in 2022, as well as the changes in terms of the elimination of the time limit on the use of tax losses provided for in said Law no. 24-D/2022, of 30 December.

The taxable profit or tax loss calculated by the Bank or its subsidiaries residing in Portugal can be corrected by the Portuguese tax administration within a period of four years, except in the case of any tax losses deduction has been made or tax credit has been used, in which the expiry period is the exercise of that right. The Group recorded provisions, current tax liabilities or deferred taxes liabilities in the amount it considers appropriate to cover tax corrections or tax losses incurred, as well as contingencies relating to years not yet reviewed by the tax authorities.

Y4. Valuation of real estate recorded in Non-current assets held for sale and in Other assets

The valuation of these assets, and consequently the impairment losses, is supported by evaluations carried out by external experts, which incorporate several assumptions, namely the selling price per square meter, discount rate, better use of the real estate and expectations regarding the development of real estate projects, as applicable, and also considers the Group's historical experience in the commercialization of real estate, its perspectives on the evolution of the real estate market and the intentions of the management body regarding the commercialization of these assets. The assumptions used in the valuations of these assets have an impact on their valuation and consequently on the determination of impairment.

Y5. Pension and other employees' benefits

Determining pension liabilities requires the use of assumptions and estimations, including the use of actuarial forecasts, estimated returns on investment, and other factors, such as discount rate, pensions and salary growth rates, mortality tables, that could impact the cost and liability of the pension plan.

The discount rate used to update the Group's pension fund liabilities, regarding the defined benefit pension plans of its employees and managers, was determined based on an analysis carried out on a set of available information, which includes, among other elements, the market references for this indicator published by internationally recognised specialized entities and which are based, as defined by IAS 19, on market yields of a universe of high quality bond issues (low risk), different maturities, called in euro and relating to a diverse and representative range of issuers (non-sovereign).

Y6. Financial instruments – IFRS 9

Y6.1. Classification and measurement

The classification and measurement of financial assets depends on the results of the SPPI test (analysis of the characteristics of the contractual cash flows to determine if they correspond only to payments of principal and interest on the outstanding capital) and the testing of the business model.

The Group determines the business model at a level that reflects how financial asset groups are managed together to achieve a specific business objective. This evaluation requires judgment, since the following aspects, among others, must be considered: the way in which the performance of assets is evaluated; the risks that affect the performance of the assets and the way these risks are managed; and how asset managers are rewarded.

The Group monitors the financial assets measured at amortised cost and at fair value through other comprehensive income that are derecognised prior to their maturity to understand the underlying reasons for their disposal and to determine whether they are consistent with the purpose of the business model defined for these assets. This monitoring is part of a process of continuous evaluation by the Group of the business model of the financial assets that remain in the portfolio, to determine if it is adequate and, if it is not, if there was a change in the business model and, consequently, a prospective classification change of these financial assets.

Y6.2. Impairment losses on financial assets at amortised cost and debt instruments at fair value through other comprehensive income

The determination of impairment losses on financial instruments involves judgments and estimations regarding, among others, the following:

Significant increase in credit risk:

Impairment losses correspond to the expected losses on a 12-month for the assets in Stage 1 and the expected losses considering the probability of a default event occurring at some point up to the maturity date of the instrument financial assets for assets in Stages 2 and 3. An asset is classified in Stage 2 whenever there is a significant increase in its credit risk since its initial recognition. In assessing the existence of a significant increase in credit risk, the Group considers qualitative and quantitative information, reasonable and sustainable.

In order to comply with the supervisors' guidelines, namely regarding to the identification and measuring credit risk in the current context of uncertainty, largely associated with the worsening of the international geopolitical context, the constraints in several relevant European economies (political instability, public budgetary pressures and lower growth) and the existence of higher interest rate levels (albeit in a process of adjustment), the Group proceeded to record additional impairments in relation to the current models of collective impairment calculation (overlays).

The exercise carried out was based on an analysis of migrations from customers identified as having the highest risk for Stage 2 and Stage 3, with the greatest impact on the corporate segment.

Definition of groups of assets with common credit risk characteristics:

When expected credit losses are measured on a collective basis, the financial instruments are grouped based on common risk characteristics. The Group monitors the adequacy of credit risk characteristics on a regular basis to assess whether it maintains its similarity. This procedure is necessary to ensure that, in the event of a change in the credit risk characteristics, the asset segmentation is reviewed. This review may result in the creation of new portfolios or in transferring assets to existing portfolios that better reflect their credit risk characteristics.

Definition of the number and relative weight of prospective information for each type of product/market and determination of relevant prospective information:

In estimating expected credit losses, the Group uses reasonable and sustainable forecasting information that is based on assumptions about the future evolution of different economic drivers and how each of the drivers impacts the remaining drivers.

Probability of default:

The probability of default represents a determining factor in the measurement of expected credit losses and corresponds to an estimation of the probability of default in each period, which is calculated based on historical data, assumptions and expectations about future conditions.

Loss given default:

It corresponds to a loss estimation in a default scenario. It is based on the difference between the contractual cash flows and those that the Group expects to receive, through the cash flows generated by the customers' business or credit collaterals. The estimation of loss given default is based on, among other aspects, the different recovery scenarios, historical information, the costs involved in the recovery process and the estimation of the valuation of collaterals associated with credit operations.

Y6.3. Fair value of financial instruments

Fair value is determined based on market quotations when available. In their absence, it is determined using prices of recent transactions for similar instruments carried out under market conditions or through valuation methodologies supported by discounted cash flow techniques, taking into consideration factors such as market conditions, the time value, the yield curve, and volatility. When these methodologies involve the use of significant unobservable inputs or assumptions, the instruments are classified as Level 3 in the fair value hierarchy, in accordance with applicable accounting standards (IFRS 13). The use of different methodologies, assumptions, or judgments may result in outcomes that differ from those reported.

In market environments characterized by higher macroeconomic uncertainty, the Group may, among other measures, reallocate risk limits and review both stress scenarios and the calculation of fair value adjustments.

Y7. Provisions for legal risk related to foreign currency-indexed mortgage loans (mostly to Swiss franc)

The Group creates provisions for legal contingencies related foreign currency-indexed mortgage loans, mostly to Swiss franc granted by Bank Millennium, S.A.

The assumptions used by Bank Millennium are essentially based on historical observations and will have to be updated in subsequent periods, which may have a relevant impact on the provision's estimation. The methodology developed by Bank Millennium is based on the following parameters: (i) the number of ongoing cases (including class action agreements) and potential future lawsuits; (ii) the currently estimated amount of Bank Millennium's potential loss in the event of a specific court judgment; (iii) the probability of obtaining a specific court judgment calculated on the basis of statistics of judgments in cases where Bank Millennium is a party and legal opinions obtained; (iv) customer behaviours monitoring by analysing their willingness to sue the Bank, including due to economic factors (v) estimates involved with amicable settlements with customers, concluded in court or out of court.

The evolution of responsibilities with legal contingencies related to mortgage loans indexed to the Swiss franc and the amount of the Bank Millennium's actual losses depend, namely, on the number of ongoing and potential lawsuits, as well as on the final court decisions about each case and amicable settlement with customers, concluded in court or out of court.

Z. Subsequent events

The Group analyses events occurred after the balance sheet date, i.e., favourable and/or unfavourable events that occur between the balance sheet date and the date the financial statements were authorized for issue. In this context, two types of events can be identified:

- i) those that provide evidence of conditions that existed at the balance sheet date (events after the balance sheet date that give rise to adjustments); and,
- ii) those that are indicative of the conditions that arose after the balance sheet date (events after the balance sheet date that do not give rise to adjustments).

Events occurred after the date of the financial statements that are not considered as adjustable events, if significant, are disclosed in the notes to the consolidated financial statements.

2. Net interest income

The amount of this account is comprised of:

	(Thousands of euros)	
	30 September 2025	30 September 2024
Interest and similar income		
Interest on deposits at Central Banks and on loans and advances to credit institutions repayable on demand	54,007	80,256
Interest on financial assets at amortised cost		
Loans and advances to credit institutions	63,219	62,445
Loans and advances to customers	2,010,982	2,362,429
Debt securities	556,715	462,211
Interest on financial assets at fair value through profit or loss		
Financial assets held for trading	52,713	38,491
Financial assets not held for trading mandatorily at fair value through profit or loss	2,217	636
Financial assets designated at fair value through profit or loss	766	709
Interest on financial assets at fair value through other comprehensive income	443,392	377,152
Interest on hedging derivatives	105,566	160,481
Interest on other assets	11,002	13,464
	3,300,579	3,558,274
Interest and similar expense		
Interest on financial liabilities at amortised cost		
Deposits from credit institutions and other funds	(29,999)	(37,307)
Deposits from customers and other funds	(739,249)	(890,106)
Non-subordinated debt securities issued	(153,730)	(131,073)
Subordinated debt	(62,022)	(61,957)
Interest on financial liabilities at fair value through profit or loss		
Financial liabilities held for trading		
Derivatives	(16,652)	(36,061)
Financial liabilities designated at fair value through profit or loss		
Deposits from customers and other funds	(24,923)	(8,302)
Non-subordinated debt securities issued	—	(271)
Interest on hedging derivatives	(98,497)	(273,087)
Interest on leasing	(8,764)	(9,135)
Interest on other liabilities	(141)	(212)
	(1,133,977)	(1,447,511)
	2,166,602	2,110,763

The balance Interest and similar income - Interest on financial assets at amortised cost - Loans and advances to customers includes the amount of EUR 42,083,000 (30 September 2024: EUR 75,554,000) related to commissions and other gains accounted for under the effective interest method, as referred in the accounting policy described in note 1 C3. The balance also includes the amount of EUR 43,862,000 (30 September 2024: EUR 60,547,000) related to interest income arising from customers classified in stage 3.

The balance Interest and similar expense - Interest on non-subordinated debt securities issued and Interest on subordinated debt include the amount of EUR 2,502,000 and EUR 548,000, respectively (30 September 2024: EUR 2,586,000 and EUR 606,000, respectively) related to commissions and other costs accounted for under the effective interest method, as referred in the accounting policy described in note 1 C3.

The balance Interest and similar expense - Interest on leasing refers to the interest cost related to the leasing liabilities recognised under IFRS 16, as referred in accounting policy described 1 H.

3. Dividends from equity instruments

The amount of this account is comprised of:

	(Thousands of euros)	
	30 September 2025	30 September 2024
Dividends from financial assets through other comprehensive income	803	822
	803	822

4. Net fees and commissions income

The amount of this account is comprised of:

	(Thousands of euros)	
	30 September 2025	30 September 2024
Fees and commissions received		
Banking services provided	408,840	401,200
Management and maintenance of accounts	133,978	127,524
<i>Bancassurance</i>	105,376	105,933
Securities operations	43,671	38,128
From guarantees granted	34,907	35,256
From commitments to third parties	4,075	3,885
Management and intervention commissions	19,230	18,511
Other commissions	17,131	16,615
	767,208	747,052
Fees and commissions paid		
Banking services provided by third parties	(101,570)	(110,662)
Securities operations	(7,031)	(6,426)
From guarantees received	(3,556)	(4,624)
<i>Bancassurance</i>	(1,494)	(1,555)
Other commissions	(24,776)	(22,016)
	(138,427)	(145,283)
	628,781	601,769

5. Gains / (losses) on financial operations

The amount of this account is comprised of:

	(Thousands of euros)	
	30 September 2025	30 September 2024
Gains/(losses) on financial operations at fair value through profit or loss		
Gains/(losses) on financial assets held for trading	117,462	139,728
Gains/(losses) on financial assets not held for trading mandatorily at fair value through profit or loss	10,424	4,202
Gains/(losses) on financial assets and liabilities designated at fair value through profit or loss	(62,009)	(161,556)
	65,877	(17,626)
Foreign exchange gains/(losses)	15,291	7,673
Gains/(losses) on hedge accounting	2,523	4,283
Gains/(losses) arising from derecognition of financial assets and liabilities not measured at fair value through profit or loss	(3,032)	34,921
	80,659	29,251

The balances Gains/(losses) on financial operations at fair value through profit or loss is comprised of:

	(Thousands of euros)	
	30 September 2025	30 September 2024
Gains/(losses) on financial assets held for trading		
<i>Gains</i>		
Debt securities portfolio	10,858	10,727
Equity instruments	14,028	25,024
Derivative financial instruments	652,281	456,179
Other operations	1,245	808
	678,412	492,738
<i>Losses</i>		
Debt securities portfolio	(6,568)	(5,556)
Equity instruments	(13,383)	(22,366)
Derivative financial instruments	(540,622)	(324,763)
Other operations	(377)	(325)
	(560,950)	(353,010)
	117,462	139,728

(continues)

(continuation)

	(Thousands of euros)	
	30 September 2025	30 September 2024
Gains/(losses) on financial assets not held for trading mandatorily at fair value through profit or loss		
<i>Gains</i>		
Loans and advances to customers	254	1,431
Debt securities portfolio	25,140	21,085
Equity instruments	28,091	18,105
	53,485	40,621
<i>Losses</i>		
Loans and advances to customers	(147)	(694)
Debt securities portfolio	(26,237)	(25,186)
Equity instruments	(16,677)	(10,539)
	(43,061)	(36,419)
	10,424	4,202
Gains/(losses) on financial assets and liabilities designated at fair value through profit or loss		
<i>Gains</i>		
Debt securities portfolio	62	316
Deposits from customers and other funds	28,333	25,520
Debt securities issued		
Certificates and structured securities issued	181,121	45,001
Other debt securities issued	—	39
	209,516	70,876
<i>Losses</i>		
Debt securities portfolio	(161)	(388)
Deposits from customers and other funds	(28,514)	(35,710)
Debt securities issued		
Certificates and structured securities issued	(242,852)	(188,900)
Other debt securities issued	—	(7,434)
	(271,527)	(232,432)
	(62,011)	(161,556)

The balances Gains / (losses) on financial assets and liabilities designated at fair value through profit or loss - Gains/ (Losses) - Certificates and structured securities issued record the valuations and devaluations of certificates issued by the Group. These liabilities are covered by futures, which valuation and devaluation are recorded in Gains / (losses) on financial assets held for trading - Gains/(Losses) - Derivative financial instruments and foreign exchange transactions recorded under the balances "Foreign exchange gains/(losses)" shown in the table below.

The balances Foreign exchange gains/(losses), Gains/(losses) on hedge accounting and Gains/(losses) arising from derecognition of financial assets and liabilities not measured at fair value through profit or loss, are presented as follows:

	(Thousands of euros)	
	30 September 2025	30 September 2024
Foreign exchange gains/(losses)		
Gains	3,320,218	2,205,276
Losses	(3,304,927)	(2,197,603)
	15,291	7,673
Gains/(losses) on hedge accounting		
<i>Gains</i>		
Hedging derivatives	661,298	367,842
Hedged items	553,804	265,718
	1,215,102	633,560
<i>Losses</i>		
Hedging derivatives	(650,853)	(331,800)
Hedged items	(561,726)	(297,477)
	(1,212,579)	(629,277)
	2,523	4,283
Gains/(losses) arising from derecognition of financial assets and liabilities not measured at fair value through profit or loss		
<i>Gains</i>		
Credit sales	9,149	38,041
Debt securities portfolio at amortised cost	690	—
Debt securities portfolio at fair value through other comprehensive income	9,767	2,656
Debt securities issued	2,466	1,563
Others	1,430	1,768
	23,502	44,028
<i>Losses</i>		
Credit sales	(593)	(4,296)
Debt securities portfolio at amortised cost	(12,534)	—
Debt securities portfolio at fair value through other comprehensive income	(3,432)	(1,460)
Debt securities issued	(9,481)	(1,144)
Others	(494)	(2,207)
	(26,534)	(9,107)
	(3,032)	34,921

6. Other operating income / (expenses)

The amount of this account is comprised of

	(Thousands of euros)	
	30 September 2025	30 September 2024
Operating income		
Gains on leasing operations	2,151	7,137
Income from services rendered	26,147	24,015
Rents	1,443	1,498
Sales of cheques and others	5,204	5,504
Other operating income	56,475	56,984
	91,420	95,138
Operating expenses		
Donations and contributions	(4,214)	(3,443)
Contribution on the Banking Sector	(9,964)	(32,997)
Contributions to Resolution Funds	(28,126)	(20,629)
Contributions to the Deposit Guarantee Fund	(13,946)	(826)
Special tax on the polish banking sector	(71,009)	(31,023)
Taxes	(11,990)	(11,813)
Losses on financial leasing operations	(145)	(47)
Other operating expenses	(79,430)	(106,037)
	(218,824)	(206,815)
	(127,404)	(111,677)

Further to Portugal's Constitutional Court decision no 478/2025 of 3rd June 2025 declaring the Solidarity Surcharge on the Banking Sector (ASSB) unconstitutional, the Group did not proceed with the self-assessment and payment of the tax which, under the rules previously in force, would be due until 30 June 2025. Further to the favorable court decision in the legal challenge against the ASSB paid in 2020, 2021 e 2022 and its final judgment, the amount of EUR 18,595 thousand was recognised as income in the first nine months of 2025. The amount of EUR 6,151 thousand was repaid to the Group at the beginning of July 2025. At the beginning of November 2025, the amount of EUR 6,644 thousand relating to the tax paid in 2022 was repaid to the Group. The amounts of the Solidarity Surcharge on the Banking Sector paid in the 2023 and 2024 financial years are being challenged in court and amount to EUR 11,969 thousand.

7. Staff costs

The amount of this account is comprised of:

	(Thousands of euros)	
	30 September 2025	30 September 2024
Remunerations	461,205	422,112
Mandatory social security charges	98,154	83,976
Voluntary social security charges	9,306	10,884
Other staff costs	6,684	5,683
	575,349	522,655

8. Other administrative costs

The amount of this account is comprised of:

	(Thousands of euros)	
	30 September 2025	30 September 2024
Water, electricity and fuel	10,633	10,796
Credit cards and mortgage	7,290	7,513
Communications	21,726	20,735
Maintenance and related services	15,166	14,368
Legal expenses	2,944	4,086
Travel, hotel and representation costs	7,551	6,751
Advisory services	34,792	34,319
Training costs	1,034	1,112
Information technology services	24,166	20,033
Consumables	5,674	6,282
Outsourcing and independent labour	101,377	84,632
Advertising	27,051	23,398
Rents and leases	19,231	22,384
Insurance	4,326	4,149
Transportation	8,555	8,660
Other specialised services	28,651	26,340
Other supplies and services	21,469	21,052
	341,636	316,610

The balance Rents and leases includes the amount of EUR 84,000 (30 September 2024: EUR 208,000) related to short-term lease contracts and the amount of EUR 1,905,000 (30 September 2024: EUR 1,843,000) related to lease contracts of low-value assets, as described in the accounting policy 1 H.

9. Amortisations and depreciations

The amount of this account is comprised of:

	(Thousands of euros)	
	30 September 2025	30 September 2024
Amortisations of intangible assets (note 30):		
Software	31,247	26,529
Other intangible assets	5,465	4,683
	36,712	31,212
Depreciations of other tangible assets (note 29):		
Properties	10,915	11,148
Equipment		
Computers	15,518	13,378
Security equipment	988	792
Indoor facilities	2,583	2,462
Machinery	1,168	1,267
Furniture	1,637	1,866
Vehicles	4,724	4,181
Other equipment	1,591	1,496
Right-of-use		
Real estate	39,695	39,533
	78,819	76,123
	115,531	107,335

10. Results on modification

The Group has accounted for in this balance a cost of EUR 5,394,000 (30 September 2024: cost of EUR 25,888,000) relating to contractual modifications made in accordance with IFRS 9, namely those negotiated with customers holding foreign currency-indexed mortgages loans in Poland, described in note 53, in the amount of EUR 2,500,000 (30 September 2024: EUR 19,485,000).

In the first nine months of 2024, this balance also included a cost with credit holidays in the amount of Euros 36,552,000, following the signing by the President of the Republic of Poland and announcement in the Journal of Laws of the Republic of Poland of an Act of 12 April 2024 on changes to the Act on support for mortgage borrowers who were in challenging financial situation and the Act on crowdfunding for business ventures and assistance to borrowers ('the Act'), introducing, among others, an extension of credit holidays for PLN mortgage borrowers by four more months in 2024.

11. Impairment of financial assets at amortised cost

The amount of this account is comprised of:

	(Thousands of euros)	
	30 September 2025	30 September 2024
Loans and advances to credit institutions (note 21)		
Charge for the period	522	293
Reversals for the period	(26)	(233)
	496	60
Loans and advances to customers (note 22)		
Charge for the period	530,532	617,407
Reversals for the period	(379,363)	(387,729)
Recoveries of loans and interest charged-off	(9,869)	(60,506)
	141,300	169,172
Debt securities (note 23)		
Associated to credit operations		
Charge for the period	1,178	—
Reversals for the period	(1,461)	(2,700)
	(283)	(2,700)
Not associated to credit operations		
Charge for the period	25,269	2,131
Reversals for the period	(5,716)	(2,595)
	19,553	(464)
	19,270	(3,164)
	161,066	166,068

12. Impairment of financial assets at fair value through other comprehensive income

The detail of this balance is comprised of:

	(Thousands of euros)	
	30 September 2025	30 September 2024
Impairment of financial assets at fair value through other comprehensive income (note 24)		
Charge for the period	3,314	4,426
Reversals for the period	(4,408)	—
	(1,094)	4,426

13. Impairment of other assets

The amount of this account is comprised of:

	(Thousands of euros)	
	30 September 2025	30 September 2024
Impairment of non-current assets held for sale (note 27)		
Charge for the period	1,382	2,563
Reversals for the period	(592)	(283)
	790	2,280
Impairment of tangible fixed assets (note 29)		
Reversals for the period	(51)	—
	(51)	—
Impairment of other assets (note 32)		
Charge for the period	10,524	14,426
Reversals for the period	(2,945)	(3,819)
	7,579	10,607
Impairment of real estate and other assets arising from recovered loans (note 32)		
Charge for the period	8,140	18,001
Reversals for the period	(223)	(453)
	7,917	17,548
	16,235	30,435

14. Other provisions

This balance is comprised of:

	(Thousands of euros)	
	30 September 2025	30 September 2024
Provision for guarantees and other commitments (note 39)		
Charge for the period	43,708	22,267
Reversals for the period	(36,624)	(30,198)
	7,084	(7,931)
Other provisions for liabilities and charges (note 39)		
Charge for the period	407,063	436,276
Reversals for the period	(5,104)	(1,904)
	401,959	434,372
	409,043	426,441

The balance Other provisions for liabilities and charges - Charge for the period refers essentially to provisions for legal risk accounted for by Bank Millennium, related to foreign currency-indexed mortgage loans, as described in note 53, in the nine months period ended 30 September 2025, amounted to EUR 355,082,000 (30 September 2024: EUR 384,883,000).

15. Share of profit of associates accounted for using the equity method

The main contributions of the investments accounted for using the equity method are analysed as follows:

	(Thousands of euros)	
	30 September 2025	30 September 2024
Banco Millennium Atlântico, S.A. (note 26)		
Appropriation of net income relating to the current period	3,369	2,154
Effect of the application of IAS 29:		
Amortisation of the effect calculated until 31 December 2018 (a)	(79)	(135)
	3,290	2,019
Millenniumbcp Ageas Grupo Segurador, S.G.P.S., S.A.	25,763	23,374
Unicre - Instituição Financeira de Crédito, S.A.	4,301	3,298
SIBS, S.G.P.S., S.A.	10,409	11,016
Banque BCP, S.A.S.	2,389	2,291
Fidelidade Moçambique - Companhia de Seguros S.A.	1,153	1,418
Other companies	(2,683)	368
	41,332	41,765
	44,622	43,784

(a) Based on the requirements of IAS 29, Angola was considered a hyperinflationary economy until 31 December 2018, for the purposes of presentation of consolidated financial statements, as described in accounting policy 1 B6. This classification is no longer applied since 1 January 2019.

16. Gains/(losses) on disposal of subsidiaries and other assets

This balance is comprised of:

	(Thousands of euros)	
	30 September 2025	30 September 2024
Gains/(Losses) on disposal of investments	15,360	(56)
Gains/(Losses) on disposal of other assets	15,447	17,546
	30,807	17,490

The balance Gains/(losses) on disposal of investments includes an amount of Euros 15,213,000 relating to a price adjustment relating to the sale process that took place in 2017 of a investment.

The balance Gains/(Losses) on disposal of other assets essentially include the result deducted from intermediation costs from the sale of assets held by the Group and classified as non-current assets held for sale and as other assets, which corresponds to a gain of EUR 5,932,000 (30 September 2024: gain of EUR 15,830,000).

17. Net income from discontinued or discontinuing operations

The amount of this account is comprised of:

	(Thousands of euros)	
	30 September 2025	30 September 2024
Fidelidade Moçambique - Companhia de Seguros S.A.		
Correction of gains on disposal of the investment held	—	322
	—	322

18. Earnings per share

The earnings per share are calculated as follows:

	(Thousands of euros)	
	30 September 2025	30 September 2024
Continuing operations		
Net income from continuing operations	884,617	792,985
Non-controlling interests	(108,702)	(79,210)
Appropriated net income from continuing operations	775,915	713,775
Interests on perpetual subordinated bonds (Additional Tier 1)	(24,375)	(25,500)
Adjusted net income from continuing operations	751,540	688,275
Discontinued or discontinuing operations (note 17)		
Net income from discontinued or discontinuing operations	—	322
Appropriated net income from discontinued or discontinuing operations	—	322
Adjusted net income	751,540	688,597
Average number of shares	14,983,744,166	15,113,989,952
Basic earnings per share (Euros):	0.067	0.061
Diluted earnings per share (Euros):	0.067	0.061

As at 30 September 2025, the Bank's share capital amounts to EUR 3,000,000,000 (30 September 2024: EUR 3,000,000,000) and is represented by 15,113,989,952 nominative book-entry shares without nominal value, fully subscribed and paid up.

The calculation of the average number of shares as at 30 September 2025 (14,983,744,166 BCP shares) took into account the repurchase of own shares that occurred in the second and third quarter of 2025 (309,362,863 BCP shares), which programme is described in note 43.

There were not identified another dilution effects of the earnings per share as at 30 September 2025 and 30 September 2024, so the diluted result is equivalent to the basic result.

19. Cash and deposits at Central Banks

This balance is analysed as follows:

	(Thousands of euros)	
	30 September 2025	31 December 2024
Cash	587,633	666,175
Central Banks		
Banco de Portugal	1,883,445	2,998,047
Central Banks abroad	1,469,821	1,924,808
	3,940,899	5,589,030

The balance Central Banks includes deposits at Central Banks of the countries where the Group operates to satisfy the legal requirements to maintain a cash reserve calculated based on the value of deposits and other effective liabilities. According to the European Central Bank System for Euro Zone, the cash reserve requirements establish the maintenance of a deposit with the Central Bank equivalent to 1% of the average value of deposits and other liabilities, during each reserve requirement period. The rate is different for countries outside the Euro Zone.

20. Loans and advances to credit institutions repayable on demand

This balance is analysed as follows:

	(Thousands of euros)	
	30 September 2025	31 December 2024
Credit institutions in Portugal	9,606	3,553
Credit institutions abroad	157,805	166,850
Amounts due for collection	68,729	80,754
	236,140	251,157

The balance Amounts due for collection represents, essentially, cheques due for collection on other financial institutions. These balances were settled in the first days of the following month.

21. Loans and advances to credit institutions

This balance is analysed as follows:

	(Thousands of euros)	
	30 September 2025	31 December 2024
Loans and advances to Central Banks		
Central Banks abroad	467,285	273,212
	467,285	273,212
Loans and advances to credit institutions in Portugal		
Term deposits	78,413	1,913
Loans	10,082	—
Other	4,417	537
	92,912	2,450
Loans and advances to credit institutions abroad		
Very short-term deposits	125,274	99,486
Term deposits	361,356	324,524
Loans	4,293	—
Term deposits to collateralise CIRS and IRS operations (*)	56,627	38,909
Other	12,184	59,066
	559,734	521,985
	1,119,931	797,647
Impairment for loans and advances to credit institutions	(582)	(112)
	1,119,349	797,535

(*) Under the scope of derivative financial instruments operations (IRS and CIRS) with institutional counterparties, and as defined in the respective contracts ("Cash collateral"), these deposits are held by the counterparties and are given as collateral of the referred operations (IRS and CIRS), whose revaluation is negative for the Group.

The changes occurred in impairment of Loans and advances to credit institutions are analysed as follows:

	(Thousands of euros)	
	30 September 2025	31 December 2024
Balance as at 1 January	112	224
Transfers	—	(3)
Charge for the period (note 11)	522	216
Reversals for the period (note 11)	(26)	(327)
Exchange rate differences	(26)	2
Balance at the end of the period	582	112

22. Loans and advances to customers

The analysis of loans and advances to customers, by type of credit, is as follows:

	(Thousands of euros)	
	30 September 2025	31 December 2024
Mortgage loans	30,559,437	29,582,285
Loans	17,028,523	16,292,820
Finance leases	4,420,323	4,336,809
Factoring operations	2,434,737	2,495,783
Current account credits	880,638	827,079
Overdrafts	1,316,176	1,109,387
Discounted bills	131,486	143,419
	56,771,320	54,787,582
Overdue loans - less than 90 days	113,895	108,019
Overdue loans - Over 90 days	493,590	498,191
	57,378,805	55,393,792
Loans impairment	(1,332,687)	(1,486,734)
	56,046,118	53,907,058

The balance Loans and advances to customers, as at 30 September 2025, is analysed as follows:

	(Thousands of euros)				
	30 September 2025				
	Outstanding loans	Overdue loans	Gross amount	Impairment	Net amount
Public sector	525,441	—	525,441	(532)	524,909
Asset-backed loans	32,723,751	84,817	32,808,568	(323,539)	32,485,029
Other guaranteed loans	4,606,202	68,838	4,675,040	(168,763)	4,506,277
Unsecured loans	9,774,053	301,925	10,075,978	(669,421)	9,406,557
Foreign loans	2,286,813	2,752	2,289,565	(16,252)	2,273,313
Factoring operations	2,434,737	51,032	2,485,769	(73,328)	2,412,441
Finance leases	4,420,323	98,121	4,518,444	(80,852)	4,437,592
	56,771,320	607,485	57,378,805	(1,332,687)	56,046,118

The balance Loans and advances to customers, as at 31 December 2024, is analysed as follows:

	(Thousands of euros)				
	31 December 2024				
	Outstanding loans	Overdue loans	Gross amount	Impairment	Net amount
Public sector	521,599	—	521,599	(436)	521,163
Asset-backed loans	32,126,373	93,095	32,219,468	(491,470)	31,727,998
Other guaranteed loans	4,193,856	82,648	4,276,504	(193,038)	4,083,466
Unsecured loans	8,856,725	280,818	9,137,543	(625,803)	8,511,740
Foreign loans	2,256,437	2,288	2,258,725	(16,463)	2,242,262
Factoring operations	2,495,783	47,383	2,543,166	(69,609)	2,473,557
Finance leases	4,336,809	99,978	4,436,787	(89,915)	4,346,872
	54,787,582	606,210	55,393,792	(1,486,734)	53,907,058

The balances Asset-backed loans and Other guaranteed loans follow the subsequent types of guarantees considered:

- Asset-backed loans: Financial collaterals, physical collaterals (movable or immovable) and amounts receivable (income consignment);
- Credit with other guarantees: First-demand guarantees issued by banks or other entities and personal guarantees.

The analysis of loans and advances to customers, as at 30 September 2025, by sector of activity, is as follows:

(Thousands of euros)						
30 September 2025						
	Outstanding loans	Overdue loans	Gross amount	Impairment	Net amount	% Gross amount
Agriculture and forestry	393,313	10,143	403,456	(13,692)	389,764	0.70 %
Fisheries	18,687	149	18,836	(1,042)	17,794	0.03 %
Mining	62,768	1,709	64,477	(2,519)	61,958	0.11 %
Food, beverage and tobacco	767,211	13,323	780,534	(54,404)	726,130	1.36 %
Textiles	377,923	26,888	404,811	(45,875)	358,936	0.71 %
Wood and cork	244,205	4,538	248,743	(13,790)	234,953	0.43 %
Paper, printing and publishing	132,283	289	132,572	(2,441)	130,131	0.23 %
Chemicals	712,962	9,438	722,400	(28,616)	693,784	1.26 %
Machinery, equipment and basic metallurgical	1,319,300	38,915	1,358,215	(68,352)	1,289,863	2.37 %
Electricity and gas	373,584	211	373,795	(3,412)	370,383	0.65 %
Water	196,713	1,666	198,379	(7,653)	190,726	0.35 %
Construction	1,402,951	23,309	1,426,260	(50,902)	1,375,358	2.49 %
Retail business	1,670,643	16,430	1,687,073	(35,054)	1,652,019	2.94 %
Wholesale business	2,111,682	35,717	2,147,399	(60,102)	2,087,297	3.74 %
Restaurants and hotels	1,208,329	6,852	1,215,181	(28,606)	1,186,575	2.12 %
Transports	1,300,199	16,777	1,316,976	(33,897)	1,283,079	2.30 %
Post offices	19,604	645	20,249	(856)	19,393	0.04 %
Telecommunications	263,918	1,875	265,793	(6,661)	259,132	0.46 %
Services						
Financial intermediation	1,493,462	2,547	1,496,009	(27,904)	1,468,105	2.61 %
Real estate activities	2,363,420	20,743	2,384,163	(51,469)	2,332,694	4.16 %
Consulting, scientific and technical activities	916,836	9,281	926,117	(38,259)	887,858	1.61 %
Administrative and support services activities	537,758	5,116	542,874	(11,148)	531,726	0.95 %
Public sector	436,379	—	436,379	(3,886)	432,493	0.76 %
Education	118,602	476	119,078	(2,211)	116,867	0.21 %
Health and collective service activities	402,339	1,529	403,868	(6,250)	397,618	0.70 %
Artistic, sports and recreational activities	187,851	1,179	189,030	(5,446)	183,584	0.33 %
Other services	285,956	4,499	290,455	(83,927)	206,528	0.51 %
Consumer loans	7,488,082	255,224	7,743,306	(455,252)	7,288,054	13.50 %
Mortgage loans	29,548,034	95,865	29,643,899	(179,760)	29,464,139	51.66 %
Other domestic activities	1,233	2	1,235	(35)	1,200	0.00 %
Other international activities	415,093	2,150	417,243	(9,266)	407,977	0.73 %
	56,771,320	607,485	57,378,805	(1,332,687)	56,046,118	100 %

The analysis of loans and advances to customers, as at 31 December 2024, by sector of activity, is as follows:

(Thousands of euros)

	31 December 2024					
	Outstanding loans	Overdue loans	Gross amount	Impairment	Net amount	% Gross amount
Agriculture and forestry	390,267	10,196	400,463	(14,639)	385,824	0.72 %
Fisheries	18,901	58	18,959	(957)	18,002	0.03 %
Mining	52,001	3,078	55,079	(4,006)	51,073	0.10 %
Food, beverage and tobacco	736,423	9,472	745,895	(37,592)	708,303	1.35 %
Textiles	348,987	13,203	362,190	(32,943)	329,247	0.65 %
Wood and cork	207,603	5,955	213,558	(8,137)	205,421	0.39 %
Paper, printing and publishing	124,157	2,235	126,392	(3,305)	123,087	0.23 %
Chemicals	666,093	7,331	673,424	(29,424)	644,000	1.22 %
Machinery, equipment and basic metallurgical	1,239,540	38,533	1,278,073	(54,854)	1,223,219	2.31 %
Electricity and gas	248,088	394	248,482	(2,312)	246,170	0.45 %
Water	193,309	600	193,909	(6,842)	187,067	0.35 %
Construction	1,510,101	26,967	1,537,068	(99,662)	1,437,406	2.78 %
Retail business	1,679,344	18,041	1,697,385	(37,302)	1,660,083	3.06 %
Wholesale business	1,981,080	38,314	2,019,394	(57,474)	1,961,920	3.65 %
Restaurants and hotels	1,283,189	12,426	1,295,615	(44,778)	1,250,837	2.34 %
Transports	1,245,907	16,935	1,262,842	(34,216)	1,228,626	2.28 %
Post offices	20,007	333	20,340	(699)	19,641	0.04 %
Telecommunications	321,680	4,947	326,627	(13,091)	313,536	0.59 %
Services						
Financial intermediation	1,321,460	1,776	1,323,236	(29,438)	1,293,798	2.39 %
Real estate activities	2,092,573	22,147	2,114,720	(48,264)	2,066,456	3.82 %
Consulting, scientific and technical activities	895,509	9,567	905,076	(165,174)	739,902	1.63 %
Administrative and support services activities	507,604	4,164	511,768	(19,388)	492,380	0.92 %
Public sector	562,272	—	562,272	(3,272)	559,000	1.02 %
Education	106,513	483	106,996	(2,066)	104,930	0.19 %
Health and collective service activities	377,299	2,298	379,597	(9,429)	370,168	0.69 %
Artistic, sports and recreational activities	179,520	745	180,265	(6,329)	173,936	0.33 %
Other services	248,951	3,957	252,908	(68,290)	184,618	0.46 %
Consumer loans	7,204,086	240,734	7,444,820	(454,045)	6,990,775	13.44 %
Mortgage loans	28,625,742	108,450	28,734,192	(188,885)	28,545,307	51.87 %
Other domestic activities	1,577	191	1,768	(197)	1,571	0.00 %
Other international activities	397,799	2,680	400,479	(9,724)	390,755	0.72 %
	54,787,582	606,210	55,393,792	(1,486,734)	53,907,058	100 %

The loans and advances to customers' portfolio includes contracts that resulted in a formal restructuring with the customers and which arise to the marking of operations as being restructured due to financial difficulties of customers. The restructuring may include in a reinforce of guarantees, liquidation of part of the credit and imply an extension of maturities or changes in interest rate. The analysis of the restructured loans, by sector of activity, is as follows:

(Thousands of euros)						
	30 September 2025			31 December 2024		
	Restructured loans	Impairment (*)	Net amount	Restructured loans	Impairment (*)	Net amount
Agriculture and forestry	12,564	(2,683)	9,881	10,656	(3,355)	7,301
Fisheries	5,906	(590)	5,316	540	(23)	517
Mining	587	(308)	279	2,421	(1,867)	554
Food, beverage and tobacco	12,114	(7,172)	4,942	12,299	(6,785)	5,514
Textiles	11,104	(2,708)	8,396	8,176	(2,318)	5,858
Wood and cork	5,964	(1,954)	4,010	3,688	(504)	3,184
Paper, printing and publishing	496	(98)	398	1,290	(953)	337
Chemicals	19,752	(8,792)	10,960	18,869	(7,813)	11,056
Machinery, equipment and basic metallurgical	20,789	(8,009)	12,780	16,718	(5,461)	11,257
Electricity and gas	22,976	(317)	22,659	23,007	(325)	22,682
Water	247	(127)	120	247	(35)	212
Construction	16,380	(6,149)	10,231	61,430	(46,455)	14,975
Retail business	13,069	(1,898)	11,171	14,059	(2,479)	11,580
Wholesale business	30,503	(7,226)	23,277	30,457	(8,330)	22,127
Restaurants and hotels	17,858	(1,670)	16,188	117,672	(10,704)	106,968
Transports	5,250	(3,029)	2,221	5,334	(3,002)	2,332
Post offices	57	(25)	32	43	(13)	30
Telecommunications	996	(906)	90	4,213	(2,225)	1,988
Services						
Financial intermediation	93,059	(2,611)	90,448	8,610	(328)	8,282
Real estate activities	50,491	(20,796)	29,695	56,397	(14,015)	42,382
Consulting, scientific and technical activities	22,749	(4,146)	18,603	161,308	(132,149)	29,159
Administrative and support services activities	11,343	(1,119)	10,224	26,654	(8,869)	17,785
Public sector	56,735	(849)	55,886	65,172	(753)	64,419
Education	2,994	(246)	2,748	1,661	(90)	1,571
Health and collective service activities	3,225	(193)	3,032	7,589	(286)	7,303
Artistic, sports and recreational activities	1,431	(1,024)	407	7,764	(2,070)	5,694
Other services	9,991	(624)	9,367	8,236	(1,192)	7,044
Consumer loans	230,810	(112,794)	118,016	257,104	(119,696)	137,408
Mortgage loans	495,101	(74,091)	421,010	573,978	(75,614)	498,364
Other domestic activities	1	—	1	3	—	3
Other international activities	240	(158)	82	340	(201)	139
	1,174,782	(272,312)	902,470	1,505,935	(457,910)	1,048,025

(*) The impairment presented in the table does not include the amounts of impairment calculated using the overlays methodology.

The changes occurred in Loans impairment are analysed as follows:

	(Thousands of euros)	
	30 September 2025	31 December 2024
Balance as at 1 January	1,486,734	1,582,650
Charge for the period in net income interest	19,025	37,861
Other transfers	(225,363)	(992)
Impairment charge for the period (note 11)	530,532	804,883
Reversals for the period (note 11)	(379,363)	(550,457)
Loans charged-off		
<i>Write-offs</i>	(32,458)	(97,731)
Credit assignments	(65,419)	(301,290)
Exchange rate differences	(1,001)	11,810
Balance at the end of the period	1,332,687	1,486,734

According to note 39, regarding the proceedings related to foreign currency-indexed mortgages of Bank Millennium the amount of EUR 1,049,450,000 has been written-off from the gross carrying amount of loans portfolio (31 December 2024: EUR 1,324,672,000).

The analysis of Write-offs, by sector of activity, is as follows:

	(Thousands of euros)	
	30 September 2025	31 December 2024
Agriculture and forestry	294	1,880
Fisheries	4	1
Mining	37	138
Food, beverage and tobacco	91	226
Textiles	358	363
Wood and cork	144	194
Paper, printing and publishing	789	75
Chemicals	1,559	374
Machinery, equipment and basic metallurgical	3,455	1,216
Electricity and gas	1	51
Water	90	49
Construction	2,147	3,922
Retail business	1,427	1,050
Wholesale business	1,784	3,211
Restaurants and hotels	603	5,848
Transports	3,305	2,101
Post offices	48	61
Telecommunications	10	1,090
Services		
Financial intermediation	618	(15,097)
Real estate activities	3,750	1,130
Consulting, scientific and technical activities	299	23,911
Administrative and support services activities	324	(33,921)
Education	18	217
Health and collective service activities	89	165
Artistic, sports and recreational activities	16	5,525
Other services	787	4,575
Consumer loans	7,837	59,729
Mortgage loans	1,379	3,089
Other domestic activities	260	387
Other international activities	935	26,171
	32,458	97,731

According to the accounting policy described in note 1 C1.3, the Group writes off a loan when it does not have reasonable expectations of recovering a financial asset in its entirety or partially. Loans written-off are recognised in off-balance sheet accounts.

The analysis of recovered loans and interest occurred during the first nine months of 2025 and 2024, by sector of activity, is as follows:

	(Thousands of euros)	
	30 September 2025	30 September 2024
Agriculture and forestry	69	3
Food, beverage and tobacco	95	594
Textiles	37	20
Wood and cork	411	43
Chemicals	166	562
Machinery, equipment and basic metallurgical	45	47
Water	7	—
Construction	839	221
Retail business	188	773
Wholesale business	142	1,306
Restaurants and hotels	45	38
Transports	319	737
Post offices	2	1
Telecommunications	20	5
Services		
Financial intermediation	907	68
Real estate activities	233	86
Consulting, scientific and technical activities	38	29
Administrative and support services activities	74	15
Health and collective service activities	—	30
Artistic, sports and recreational activities	1	1
Other services	4	503
Consumer loans	5,530	7,964
Mortgage loans	660	601
Other domestic activities	—	17
Other international activities	37	46,842
	9,869	60,506

23. Debt securities

The balance Debt securities is analysed as follows:

	(Thousands of euros)	
	30 September 2025	31 December 2024
Debt securities held associated with credit operations		
Portuguese public issuers		
Bonds	616,521	—
Other Portuguese issuers		
Bonds	882,247	93,734
Commercial paper	2,464,488	1,681,923
Foreign issuers		
Commercial paper	35,244	26,224
	3,998,500	1,801,881
Overdue securities - over 90 days	4,449	4,449
	4,002,949	1,806,330
Impairment	(52,787)	(7,308)
	3,950,162	1,799,022
Debt securities held not associated with credit operations		
Bonds issued by public entities (*)		
Portuguese issuers	1,346,395	3,135,453
Foreign issuers	19,294,492	15,228,401
Bonds issued by public companies and other entities		
Portuguese issuers	—	695,257
Foreign issuers	447,451	539,011
	21,088,338	19,598,122
Impairment	(62,693)	(51,973)
	21,025,645	19,546,149
	24,975,807	21,345,171

(*) Includes the negative amount of EUR 219,352,000 (31 December 2024: negative amount of EUR 289,655,000) related to adjustments resulting from the application of fair value hedge accounting.

During the first half of 2025, the Bank began to present a set of debt securities, due to their characteristics, associated with credit operations of Portuguese public issuers amounting to EUR 445,756,000 (31 December 2024: EUR 451,563,000) and Other Portuguese issuers amounting to EUR 702,467,000 (31 December 2024: EUR 695,257,000).

Under the terms of IFRS 9, the balance Debt securities held not associated with credit operations - Bonds issued by public issuers, includes essentially a portfolio of securities to support Group's ALM (Asset and Liability Management), whose business model seeks to receive the respective income until maturity, that is, of a portfolio Held to Collect, whose value as at 30 September 2025 amounts to EUR 14,173,463,000 (31 December 2024: EUR 12,213,890,000).

The analysis of debt securities portfolio, net of impairment, by sector of activity, is analysed as follows:

	(Thousands of euros)	
	30 September 2025	31 December 2024
Debt securities held associated with credit operations		
Agriculture and forestry	16,592	2,484
Mining	127,526	98,541
Food, beverage and tobacco	120,843	118,851
Textiles	49,427	37,557
Wood and cork	22,734	25,811
Paper, printing and publishing	3,213	6,781
Chemicals	225,198	211,807
Machinery, equipment and basic metallurgical	98,443	67,948
Electricity and gas	314,614	201,886
Water	35,022	35,012
Construction	17,666	8,996
Retail business	31,300	40,359
Wholesale business	154,643	36,583
Restaurants and hotels	15,833	8,946
Transports	78,060	29,659
Services		
Financial intermediation	479,641	124,411
Real estate activities	45,851	59,793
Consulting, scientific and technical activities	1,427,983	626,336
Administrative and support services activities	17,804	17,422
Health and collective service activities	6,041	4,960
Artistic, sports and recreational activities	10,404	6,618
Other services	—	2,037
Other international activities	35,244	26,224
	3,334,082	1,799,022
Government and Public securities	616,080	—
	3,950,162	1,799,022
Debt securities held not associated with credit operations		
Machinery, equipment and basic metallurgical	—	24,035
Electricity and gas	—	100,225
Wholesale business	—	100,170
Services		
Financial intermediation	447,451	559,873
Consulting, scientific and technical activities	—	447,813
	447,451	1,232,116
Government and Public securities	20,578,194	18,314,033
	21,025,645	19,546,149
	24,975,807	21,345,171

The analysis of restructured debt securities portfolio, by sector of activity, is analysed as follows:

	30 September 2025			31 December 2024		
	Restructured loans	Impairment	Net amount	Restructured loans	Impairment	Net amount
Debt securities held associated with credit operations						
Food, beverage and tobacco	8,681	(188)	8,493	9,279	(205)	9,074
Textiles	250	(12)	238	354	(17)	337
Chemicals	4,449	(4,412)	37	4,449	(3,234)	1,215
Services						
Real estate activities	31,765	(29,697)	2,068	—	—	—
Consulting, scientific and technical activities	20,345	(11,192)	9,153	—	—	—
Administrative and support services activities	—	—	—	10,007	(84)	9,923
	65,490	(45,501)	19,989	24,089	(3,540)	20,549

The changes occurred in impairment of debt securities are analysed as follows:

	30 September 2025	31 December 2024
Debt securities held associated with credit operations		
Balance as at 1 January	7,308	8,668
Charge for the period in net income interest	—	48
Transfers	45,250	—
Charge for the period (note 11)	1,178	1,691
Reversals for the period (note 11)	(1,461)	(3,099)
Exchange rate differences	512	—
Balance at the end of the period	52,787	7,308
Debt securities held not associated with credit operations		
Balance as at 1 January	51,973	16,720
Other transfers	(3,429)	940
Charge for the period (note 11)	25,269	35,485
Reversals for the period (note 11)	(5,716)	(2,571)
Amounts charged-off	—	(293)
Exchange rate differences	(5,404)	1,692
Balance at the end of the period	62,693	51,973

24. Financial assets at fair value through profit or loss and financial assets at fair value through other comprehensive income

The balances Financial assets at fair value through profit or loss and Financial assets at fair value through other comprehensive income are analysed as follows:

	(Thousands of euros)	
	30 September 2025	31 December 2024
Financial assets at fair value through profit or loss		
Financial assets held for trading		
Repurchase agreement transaction	112,483	—
Debt instruments	737,505	1,259,178
Equity instruments	150,740	117,151
Trading derivatives	384,840	387,073
	1,385,568	1,763,402
Financial assets not held for trading mandatorily at fair value through profit or loss		
Loans and advances to customers at fair value	191	427
Debt instruments	232,067	236,346
Equity instruments	107,971	118,438
	340,229	355,211
Financial assets designated at fair value through profit or loss		
Debt instruments	37,397	33,894
	37,397	33,894
Financial assets at fair value through other comprehensive income		
Debt instruments	15,546,348	12,872,637
Equity instruments	25,686	26,329
	15,572,034	12,898,966
	17,335,228	15,051,473

The portfolio of Financial assets at fair value through profit or loss (excluding Loans and advances to customers at fair value) and Financial assets at fair value through other comprehensive income, net of impairment, by type of asset, as at 30 September 2025, is analysed as follows:

(Thousands of euros)

	30 September 2025				
	At fair value through profit or loss				Total
	Held for trading	Not held for trading mandatorily at fair value through profit or loss	Designated at fair value through profit or loss	At fair value through other comprehensive income	
Debt instruments					
Bonds issued by public entities					
Portuguese issuers	8,101	—	37,397	534,568	580,066
Foreign issuers	174,253	—	—	9,877,634	10,051,887
Bonds issued by public companies and other entities					
Portuguese issuers	—	—	—	563,929	563,929
Foreign issuers	53	—	—	1,479,976	1,480,029
Treasury bills (Public Issuers and Central Banks)					
Portuguese issuers	456,437	—	—	—	456,437
Foreign issuers	98,661	—	—	3,090,241	3,188,902
Shares of foreign companies (a)	—	8,332	—	—	8,332
Investment units (b)	—	223,735	—	—	223,735
	737,505	232,067	37,397	15,546,348	16,553,317
Equity instruments					
Shares					
Portuguese companies	43,389	—	—	15,271	58,660
Foreign companies	43	35,556	—	10,415	46,014
Investment units (c)	—	72,415	—	—	72,415
Other securities (d)	107,308	—	—	—	107,308
	150,740	107,971	—	25,686	284,397
Trading derivatives	384,840	—	—	—	384,840
	1,273,085	340,038	37,397	15,572,034	17,222,554

(a) These shares are considered as debt instruments because they do not fall within the definition of equity instruments provided by IAS 32.

(b) These investment units are considered as debt instruments because they do not fall within the definition of equity instruments provided by IAS 32.

(c) These investment units were considered as equity instruments in accordance with the terms provided in IAS 32.

(d) Includes the amount of EUR 107,309,000 in Exchange Traded Funds (ETFs).

The balance Financial assets held for trading include bonds issued with different levels of subordination associated with the traditional securitization transactions Magellan Mortgages No. 4, referred in note 1 D, in the amount of EUR 53,000 (31 December 2024: EUR 59,000).

In accordance with the accounting policy C1.1.3 regarding the classification of financial assets, the securities accounted for in Financial assets designated at fair value through profit or loss are covering economically the "Treasury Bond Certificates October 2025" issued by Banco Comercial Português, S.A. which are recorded in Financial liabilities designated at fair value through profit or loss (note 38).

The portfolio of Financial assets at fair value through profit or loss (excluding Loans and advances to customers at fair value) and Financial assets at fair value through other comprehensive income, net of impairment, by type of asset, as at 31 December 2024, is analysed as follows:

(Thousands of euros)

	31 December 2024				
	At fair value through profit or loss				
	Held for trading	Not held for trading mandatorily at fair value through profit or loss	Designated at fair value through profit or loss	At fair value through other comprehensive income	Total
Debt instruments					
Bonds issued by public entities					
Portuguese issuers	11,454	—	33,894	740,378	785,726
Foreign issuers	129,858	—	—	7,671,017	7,800,875
Bonds issued by public companies and other entities					
Portuguese issuers	—	51	—	589,028	589,079
Foreign issuers	362	—	—	1,381,364	1,381,726
Treasury bills (Public Issuers and Central Banks)					
Portuguese issuers	846,797	—	—	138,055	984,852
Foreign issuers	270,707	—	—	2,352,795	2,623,502
Shares of foreign companies (a)	—	15,189	—	—	15,189
Investment units (b)	—	221,106	—	—	221,106
	1,259,178	236,346	33,894	12,872,637	14,402,055
Equity instruments					
Shares					
Portuguese companies	29,561	—	—	15,467	45,028
Foreign companies	27	15,575	—	10,862	26,464
Investment units (c)	—	102,863	—	—	102,863
Other securities (d)	87,563	—	—	—	87,563
	117,151	118,438	—	26,329	261,918
Trading derivatives	387,073	—	—	—	387,073
	1,763,402	354,784	33,894	12,898,966	15,051,046

(a) These shares are considered as debt instruments because they do not fall within the definition of equity instruments provided by IAS 32.

(b) These investment units are considered debt instruments because they do not fall within the definition of equity instruments provided by IAS 32.

(c) These investment units were considered as equity instruments in accordance with the terms provided in IAS 32.

(d) Includes the amount of EUR 87,108,000 in Exchange Traded Funds (ETFs).

The changes occurred in impairment of financial assets at fair value through other comprehensive income, are analysed as follows:

	(Thousands of euros)	
	30 September 2025	31 December 2024
Balance as at 1 January	1,169	1,150
Transfers to changes in fair value (note 44)	944	(10,549)
Impairment through profit or loss (note 12)	3,314	10,255
Reversals through profit or loss (note 12)	(4,408)	(42)
Exchange rate differences	159	355
Balance at the end of the period	1,178	1,169

The accumulated impairment related to credit risk associated with the financial assets at fair value through other comprehensive income amounts to EUR 10,165,000 and is recognised against Fair value reserves (31 December 2024: EUR 8,699,000).

The portfolio of financial assets at fair value through other comprehensive income, as at 30 September 2025, is analysed as follows:

	(Thousands of euros)			
	30 September 2025			
	Amortised cost (a)	Fair value hedge adjustments (note 44)	Fair value adjustments (note 44)	Total
Debt instruments				
Bonds issued by public entities				
Portuguese issuers	586,490	(48,536)	(3,386)	534,568
Foreign issuers	9,837,251	4,299	36,084	9,877,634
Bonds issued by public companies and other entities				
Portuguese issuers	559,076	2,219	2,634	563,929
Foreign issuers	1,477,771	(9,303)	11,508	1,479,976
Treasury bills (Public Issuers and Central Banks)				
Foreign issuers	3,089,202	—	1,039	3,090,241
	15,549,790	(51,321)	47,879	15,546,348
Equity instruments				
Shares				
Portuguese companies	21,076	—	(5,805)	15,271
Foreign companies	5,889	—	4,526	10,415
	26,965	—	(1,279)	25,686
	15,576,755	(51,321)	46,600	15,572,034

(a) Includes interest accrued and accumulated impairment for debt securities classified as financial assets at fair value through other comprehensive income, as provided by IFRS 9, and according to the requirements defined in the accounting policy 1 C1.5.1.2.

The portfolio of financial assets at fair value through other comprehensive income, as at 31 December 2024, is analysed as follows:

(Thousands of euros)

	31 December 2024			Total
	Amortised cost (a)	Fair value hedge adjustments (note 44)	Fair value adjustments (note 44)	
Debt instruments				
Bonds issued by public entities				
Portuguese issuers	794,782	(42,290)	(12,114)	740,378
Foreign issuers	7,650,395	10,044	10,578	7,671,017
Bonds issued by public companies and other entities				
Portuguese issuers	585,957	1,091	1,980	589,028
Foreign issuers	1,408,681	(22,191)	(5,126)	1,381,364
Treasury bills (Public Issuers and Central Banks)				
Portuguese issuers	137,948	—	107	138,055
Foreign issuers	2,347,811	—	4,984	2,352,795
	12,925,574	(53,346)	409	12,872,637
Equity instruments				
Shares				
Portuguese companies	21,288	—	(5,821)	15,467
Foreign companies	6,092	—	4,770	10,862
	27,380	—	(1,051)	26,329
	12,952,954	(53,346)	(642)	12,898,966

(a) Includes interest accrued and accumulated impairment for debt securities classified as financial assets at fair value through other comprehensive income, as provided by IFRS 9, and according to the requirements defined in the accounting policy 1 C1.5.1.2.

The analysis of Financial assets at fair value through profit or loss (excluding loans and advances to customers at fair value and trading derivatives) and Financial assets at fair value through other comprehensive income, by sector of activity, as at 30 September 2025, is as follows:

(Thousands of euros)

	30 September 2025			
	Bonds and Treasury bills	Shares	Other Financial Assets	Total
Agriculture and forestry	5,099	—	—	5,099
Mining	—	19	—	19
Paper, printing and publishing	49,811	—	—	49,811
Chemicals	17,893	4	—	17,897
Machinery, equipment and basic metallurgical	—	3	—	3
Electricity and gas	208,958	—	—	208,958
Water	18,498	—	—	18,498
Construction	5,063	3	—	5,066
Wholesale business	17,346	—	—	17,346
Transports	51,401	—	—	51,401
Telecommunications	58,941	4,413	—	63,354
Services				
Financial intermediation	3,878,062	59,089	403,458	4,340,609
Consulting, scientific and technical activities	66,688	43,558	—	110,246
Administrative and support services activities	19,780	5,895	—	25,675
Public sector	49,128	—	—	49,128
Health and collective service activities	10,608	—	—	10,608
Other services	—	21	—	21
Other international activities	—	1	—	1
	4,457,276	113,006	403,458	4,973,740
Government and Public securities	11,863,974	—	—	11,863,974
	16,321,250	113,006	403,458	16,837,714

The analysis of Financial assets at fair value through profit or loss (excluding loans and advances to customers at fair value and trading derivatives) and Financial assets at fair value through other comprehensive income, by sector of activity, as at 31 December 2024, is as follows:

(Thousands of euros)

	31 December 2024			
	Bonds and Treasury bills	Shares	Other Financial Assets	Total
Agriculture and forestry	4,992	—	—	4,992
Mining	—	6	—	6
Paper, printing and publishing	49,225	—	—	49,225
Chemicals	—	5	—	5
Machinery, equipment and basic metallurgical	—	4	—	4
Electricity and gas	181,356	—	—	181,356
Water	17,841	—	—	17,841
Construction	—	3	—	3
Wholesale business	7,192	320	—	7,512
Transports	36,268	—	—	36,268
Telecommunications	43,126	4,413	—	47,539
Services				
Financial intermediation	3,569,543	46,281	410,948	4,026,772
Real estate activities	—	—	130	130
Consulting, scientific and technical activities	135,278	29,731	—	165,009
Administrative and support services activities	19,669	5,895	—	25,564
Public sector	49,415	—	454	49,869
Health and collective service activities	10,642	—	—	10,642
Other services	—	22	—	22
Other international activities	—	1	—	1
	4,124,547	86,681	411,532	4,622,760
Government and Public securities	10,041,213	—	—	10,041,213
	14,165,760	86,681	411,532	14,663,973

25. Hedging derivatives

This balance is analysed, by hedging instruments, as follows:

(Thousands of euros)

	30 September 2025		31 December 2024	
	Assets	Liabilities	Assets	Liabilities
Swaps	23,363	38,805	69,349	39,041

26. Investments in associates

This balance is analysed as follows:

	(Thousands of euros)	
	30 September 2025	31 December 2024
Portuguese credit institutions	51,501	50,153
Foreign credit institutions	122,271	128,829
Other Portuguese companies	262,983	253,146
Other foreign companies	41,220	42,746
	477,975	474,874
Impairment	(42,142)	(45,451)
	435,833	429,423

The balance Investments in associates, as at 30 September 2025, is analysed as follows:

	(Thousands of euros)		
	30 September 2025		
	Global value of investment	Impairment of investments in associates	Book value of investment
Millenniumbcp Ageas Grupo Segurador, S.G.P.S., S.A.	113,765	—	113,765
Banco Millennium Atlântico, S.A.	69,344	(24,131)	45,213
Banque BCP, S.A.S.	52,927	—	52,927
SIBS, S.G.P.S., S.A.	81,339	—	81,339
Unicre - Instituição Financeira de Crédito, S.A.	51,501	—	51,501
Fidelidade Moçambique - Companhia de Seguros S.A.	12,812	—	12,812
Lusofundo - Fundo de Investimento Imobiliário Fechado (in liquidation)	16,648	—	16,648
Fundo Especial de Investimento Imobiliário Fechado Eurofundo (in liquidation)	3,055	—	3,055
Fundo Turismo Algarve FCR	40,926	—	40,926
Europa Millennium Financial Services Sp. z o.o.	10,324	—	10,324
Nexponor - Sociedade de Investimento Coletivo Imobiliário Fechado, S.A. (in liquidation)	7,250	—	7,250
TIICC S.A.R.L.	73	—	73
Webspectator Corporation	18,011	(18,011)	—
	477,975	(42,142)	435,833

These investments refer to entities whose shares are not listed on the stock exchange. According to the accounting policy described in note 1 B, these investments are measured at the equity method.

The balance Investments in associates, as at 31 December 2024, is analysed as follows:

(Thousands of euros)			
	31 December 2024		
	Global value of investment	Impairment of investments in associates	Book value of investment
Millenniumbcp Ageas Grupo Segurador, S.G.P.S., S.A.	106,675	—	106,675
Banco Millennium Atlântico, S.A.	74,882	(27,440)	47,442
Banque BCP, S.A.S.	53,947	—	53,947
SIBS, S.G.P.S., S.A.	74,795	—	74,795
Unicre - Instituição Financeira de Crédito, S.A.	50,153	—	50,153
Fidelidade Moçambique - Companhia de Seguros S.A.	14,371	—	14,371
Lusofundo - Fundo de Investimento Imobiliário Fechado (in liquidation)	19,175	—	19,175
Fundo Especial de Investimento Imobiliário Fechado Eurofundo (in liquidation)	4,305	—	4,305
Fundo Turismo Algarve FCR	41,045	—	41,045
Europa Millennium Financial Services Sp. z o.o.	10,291	—	10,291
Nexponor - Sociedade de Investimento Coletivo Imobiliário Fechado, S.A. (in liquidation)	7,151	—	7,151
TIICC S.A.R.L.	73	—	73
Webspectator Corporation	18,011	(18,011)	—
	474,874	(45,451)	429,423

The Group's companies included in the consolidation perimeter are presented in note 54, as well as the main indicators of the most relevant ones.

The movements occurred in Impairment of investments in associates are analysed as follows:

(Thousands of euros)		
	30 September 2025	31 December 2024
Balance as at 1 January	45,451	46,355
Exchange rate differences	(3,309)	(904)
Balance at the end of the period	42,142	45,451

27. Non-current assets held for sale

This balance is analysed as follows:

	(Thousands of euros)					
	30 September 2025			31 December 2024		
	Gross value	Impairment	Net value	Gross value	Impairment	Net value
Real estate						
Assets arising from recovered loans	68,385	(16,827)	51,558	37,643	(12,151)	25,492
Assets belong to investments funds and real estate companies	5,045	(1,903)	3,142	5,528	(1,900)	3,628
Assets for own use (closed branches)	1,227	(181)	1,046	1,980	(820)	1,160
Equipment and other	4,088	(825)	3,263	4,462	(755)	3,707
Other assets (*)	15,965	(5,728)	10,237	16,985	(5,727)	11,258
	94,710	(25,464)	69,246	66,598	(21,353)	45,245

(*) includes Shares, Price Deposit and Property Adjudication Proposals

The assets included in this balance are accounted for in accordance with the accounting policy described in note 1 G.

The balance Real estate - Assets arising from recovered loans includes, essentially, real estate resulted from process of recovered loans or judicial auction being accounted for at the time the Group assumes control of the asset, which is usually associated with the transfer of their legal ownership.

The Group has a strategy for sale these assets, consistent with the characteristic of each asset as well as with the breakdown of underlying valuations. However, considering the formal constraints, it was not possible in all instances to conclude the sales in the expected time. The sale strategy is based in an active search of buyers, with the Group having a website where advertises these properties and through partnerships with the mediation of companies having more ability for the product that each time the Group has for sale. Prices are periodically reviewed and adjusted for continuous adaptation to the market. The Group requests, regularly, to the European Central Bank, the extension of the period of holding these properties.

The changes occurred in Impairment of non-current assets held for sale are analysed as follows:

	(Thousands of euros)	
	30 September 2025	31 December 2024
Balance as at 1 January	21,353	52,196
Other transfers	13,431	8,575
Charge for the period (note 13)	1,382	5,722
Reversals for the period (note 13)	(592)	(1,398)
Amounts charged-off	(9,877)	(43,808)
Exchange rate differences	(233)	66
Balance at the end of the period	25,464	21,353

28. Investment property

The balance Investment property corresponds to real estate valued in accordance with the accounting policy presented in note 1 N, based on independent assessments and compliance with legal requirements.

29. Other tangible assets

This balance is analysed as follows:

	(Thousands of euros)	
	30 September 2025	31 December 2024
Real estate	665,205	675,021
Equipment		
Computer equipment	324,459	321,858
Security equipment	64,426	63,919
Facilities	138,212	137,412
Machinery	46,888	47,297
Furniture	76,020	76,733
Vehicles	38,184	38,920
Other equipment	31,317	33,492
Right of use		
Real estate	439,530	430,349
Assets under construction	25,067	28,846
Other tangible assets	12	15
	<u>1,849,320</u>	<u>1,853,862</u>
Accumulated depreciation		
Relative to the current period (note 9)	(78,819)	(102,125)
Relative to the previous periods	<u>(1,198,706)</u>	<u>(1,132,398)</u>
	<u>(1,277,525)</u>	<u>(1,234,523)</u>
Impairment	—	(193)
	<u>571,795</u>	<u>619,146</u>

The balance Real Estate includes the amount of EUR 107,833,000 (31 December 2024: EUR 107,833,000) related to real estate held by the Group's real estate investment funds.

The balance Right-of-use corresponds to real estate (branches and central buildings) which are amortised according to the lease term of each contract, as described in the accounting policy 1 H.

The changes occurred in Other tangible assets are analysed as follows:

(Thousands of euros)

	2025					
	Balance as at 1 January	Acquisitions / Charge	Disposals / Write-off	Transfers	Exchange rate differences	Balance as at 30 September
Real estate	675,021	16	(4,655)	4,594	(9,771)	665,205
Equipment:						
Computer equipment	321,858	6,723	(2,547)	4,144	(5,719)	324,459
Security equipment	63,919	275	(181)	1,309	(896)	64,426
Facilities	137,412	1,010	(348)	2,321	(2,183)	138,212
Machinery	47,297	331	(1,789)	1,418	(369)	46,888
Furniture	76,733	379	(656)	371	(807)	76,020
Vehicles	38,920	4,708	(4,359)	179	(1,264)	38,184
Other equipment	33,492	33	(3,456)	1,188	60	31,317
Right of use						
Real estate	430,349	19,093	(6,135)	—	(3,777)	439,530
Assets under construction	28,846	15,800	(1,335)	(17,477)	(767)	25,067
Other tangible assets	15	—	—	—	(3)	12
	1,853,862	48,368	(25,461)	(1,953)	(25,496)	1,849,320
Accumulated depreciation						
Real estate	(420,458)	(10,915)	3,660	915	3,375	(423,423)
Equipment:						
Computer equipment	(253,376)	(15,518)	2,484	(27)	4,503	(261,934)
Security equipment	(59,879)	(988)	154	—	630	(60,083)
Facilities	(120,356)	(2,583)	300	23	1,372	(121,244)
Machinery	(39,578)	(1,168)	1,169	(439)	262	(39,754)
Furniture	(72,796)	(1,637)	573	468	619	(72,773)
Vehicles	(19,690)	(4,724)	3,771	—	824	(19,819)
Other equipment	(26,773)	(1,591)	3,144	49	(45)	(25,216)
Right of use						
Real estate	(221,605)	(39,695)	5,470	(57)	2,620	(253,267)
Other tangible assets	(12)	—	—	—	—	(12)
	(1,234,523)	(78,819)	20,725	932	14,160	(1,277,525)
	619,339	(30,451)	(4,736)	(1,021)	(11,336)	571,795

The changes occurred in Other tangible assets are analysed as follows:

(Thousands of euros)

	2024					Balance as at 31 December
	Balance as at 1 January	Acquisitions / Charge	Disposals / Write-off	Transfers	Exchange rate differences	
Real estate	669,847	92	(4,090)	2,584	6,588	675,021
Equipment:						
Computer equipment	346,220	25,487	(62,528)	8,920	3,759	321,858
Security equipment	67,587	442	(5,124)	583	431	63,919
Facilities	151,649	617	(18,029)	2,085	1,090	137,412
Machinery	49,712	542	(5,107)	1,556	594	47,297
Furniture	84,154	539	(9,227)	848	419	76,733
Vehicles	35,839	9,099	(6,865)	—	847	38,920
Other equipment	31,842	17	(714)	1,856	491	33,492
Right of use						
Real estate	390,625	42,252	(6,819)	1	4,290	430,349
Assets under construction	20,563	31,888	(362)	(23,919)	676	28,846
Other tangible assets	36	—	(24)	—	3	15
	1,848,074	110,975	(118,889)	(5,486)	19,188	1,853,862
Accumulated depreciation						
Real estate	(410,455)	(14,769)	3,978	3,524	(2,736)	(420,458)
Equipment:						
Computer equipment	(294,471)	(18,347)	62,336	(83)	(2,811)	(253,376)
Security equipment	(63,599)	(1,076)	5,116	—	(320)	(59,879)
Facilities	(134,380)	(3,305)	17,970	66	(707)	(120,356)
Machinery	(42,015)	(1,682)	5,102	(539)	(444)	(39,578)
Furniture	(79,822)	(2,423)	9,196	576	(323)	(72,796)
Vehicles	(19,188)	(5,702)	5,723	8	(531)	(19,690)
Other equipment	(25,101)	(1,994)	705	—	(383)	(26,773)
Right of use						
Real estate	(172,560)	(52,827)	6,358	4	(2,580)	(221,605)
Other tangible assets	(36)	—	24	—	—	(12)
	(1,241,627)	(102,125)	116,508	3,556	(10,835)	(1,234,523)
	606,447	8,850	(2,381)	(1,930)	8,353	619,339

The changes occurred in impairment for tangible fixed assets are analysed as follow:

	(Thousands of euros)	
	30 September 2025	31 December 2024
Balance as at 1 January	193	—
Charge for the period (note 13)	—	184
Reversals for the period (note 13)	(51)	—
Amounts charged-off	(121)	—
Exchange rate differences	(21)	9
Balance at the end of the period	—	193

30. Goodwill and intangible assets

This balance is analysed as follows:

	(Thousands of euros)	
	30 September 2025	31 December 2024
Goodwill - Differences arising on consolidation		
Bank Millennium, S.A. (Poland)	112,732	112,374
Euro Bank, S.A. (Poland)	45,067	44,924
Others	10,155	10,193
	167,954	167,491
Impairment		
Bank Millennium, S.A. (Poland)	(112,732)	(112,374)
Others	(9,880)	(9,880)
	(122,612)	(122,254)
	45,342	45,237
Intangible assets		
Software	312,688	291,642
Software - in progress	87,913	71,726
Other intangible assets	53,093	49,797
	453,694	413,165
Accumulated amortisation		
Charge for the period (note 9)	(36,712)	(42,675)
Charge for the previous periods	(165,287)	(139,757)
	(201,999)	(182,432)
	251,695	230,733
	297,037	275,970

The changes occurred in Goodwill and intangible assets are analysed as follows:

(Thousands of euros)

	2025					Balance as at 30 September
	Balance as at 1 January	Acquisitions / Charge	Disposals / Write-off	Transfers	Exchange rate differences	
Goodwill - Differences arising on consolidation	167,491	—	—	—	463	167,954
Impairment	(122,254)	—	—	—	(358)	(122,612)
	45,237	—	—	—	105	45,342
Intangible assets						
Software	291,642	12,823	(13,620)	27,045	(5,202)	312,688
Software - in progress	71,726	46,908	(159)	(30,222)	(340)	87,913
Other intangible assets	49,797	7	—	3,163	126	53,093
	413,165	59,738	(13,779)	(14)	(5,416)	453,694
Accumulated amortisation						
Software	(149,965)	(31,247)	13,606	23	3,592	(163,991)
Other intangible assets	(32,467)	(5,465)	—	(23)	(53)	(38,008)
	(182,432)	(36,712)	13,606	—	3,539	(201,999)
	230,733	23,026	(173)	(14)	(1,877)	251,695
	275,970	23,026	(173)	(14)	(1,772)	297,037

The changes occurred in Goodwill and intangible assets are analysed as follows:

(Thousands of euros)

	2024					Balance as at 31 December
	Balance as at 1 January	Acquisitions / Charge	Disposals / Write-off	Transfers	Exchange rate differences	
Goodwill - Differences arising on consolidation	165,043	—	—	—	2,448	167,491
Impairment	(120,520)	—	—	—	(1,734)	(122,254)
	44,523	—	—	—	714	45,237
Intangible assets						
Software	243,546	23,969	(27,523)	47,725	3,925	291,642
Software - in progress	66,230	69,410	(218)	(64,566)	870	71,726
Other intangible assets	80,598	—	(48,783)	16,928	1,054	49,797
	390,374	93,379	(76,524)	87	5,849	413,165
Accumulated amortisation						
Software	(138,508)	(35,632)	26,919	44	(2,788)	(149,965)
Other intangible assets	(73,284)	(7,043)	48,783	(44)	(879)	(32,467)
	(211,792)	(42,675)	75,702	—	(3,667)	(182,432)
	178,582	50,704	(822)	87	2,182	230,733
	223,105	50,704	(822)	87	2,896	275,970

31. Income tax

Income tax assets and liabilities are analysed as follows:

(Thousands of euros)						
	30 September 2025			31 December 2024		
	Assets	Liabilities	Net	Assets	Liabilities	Net
Deferred taxes not depending on the future profits (a)						
Impairment losses (b)	763,871	—	763,871	802,998	—	802,998
Employee benefits	396,149	—	396,149	539,415	—	539,415
	1,160,020	—	1,160,020	1,342,413	—	1,342,413
Deferred taxes depending on the future profits						
Impairment losses (b)	419,531	(2,843)	416,688	458,636	—	458,636
Tax losses carried forward	156,427	—	156,427	148,155	—	148,155
Employee benefits	60,863	(66,733)	(5,870)	61,212	(36,601)	24,611
Financial assets at fair value through other comprehensive income	233,351	(84,638)	148,713	348,396	(86,072)	262,324
Derivatives	—	(5,457)	(5,457)	—	(8,208)	(8,208)
Intangible assets	1,021	—	1,021	1,012	—	1,012
Other tangible assets	9,685	(2,716)	6,969	9,395	(3,065)	6,330
Others (c)	165,628	(178,305)	(12,677)	155,658	(144,908)	10,750
	1,046,506	(340,692)	705,814	1,182,464	(278,854)	903,610
Total deferred taxes	2,206,526	(340,692)	1,865,834	2,524,877	(278,854)	2,246,023
Offset between deferred tax assets and deferred tax liabilities	(333,311)	333,311	—	(271,420)	271,420	—
Net deferred taxes	1,873,215	(7,381)	1,865,834	2,253,457	(7,434)	2,246,023
Current taxes (d)	—	—	—	21,159	(136,008)	—

(a) Special Regime applicable to deferred tax assets.

(b) The amounts for 2025 and 2024 include deferred tax assets related with credit impairments losses not deducted for tax purposes of which credits were written-off, according to the expectation that the use of such impairment will be deductible in the tax periods in which the legal conditions required for their tax deductibility are met.

(c) Includes EUR 66,529,000 (31 December 2024: EUR 61,929,000) relating to fair value adjustments of interests in real estate investment funds and venture capital funds classified as equity instruments.

(d) The amounts of current taxes assets and liabilities refer exclusively to income taxes levied on the various BCP Group companies.

Special regime applicable to deferred tax assets

At the Extraordinary General Meeting of 15 October 2014 of Banco Comercial Português, S.A. and the General Meeting of 5 November 2014 of Banco ActivoBank, S.A., it was approved and resolved that these banks adhere to the Special Regime approved by Law 61/2014, of 26 August, applicable to deferred tax assets that resulted from the non-deduction of expenses and negative equity variations related to impairment losses on credits and post-employment or long-term employee benefits.

The special regime is applicable to those expenses and negative equity variations recorded in tax periods beginning on or after 1 January 2015, as well as to deferred tax assets recorded in the annual accounts for the last tax period prior to that date and to part of expenses and negative equity variations associated with them. Pursuant to Law 23/2016, of 19 August, this special regime is not applicable to expenses and negative equity variations with impairment losses on credits and with post-employment or long-term employee benefits recorded in the tax periods commencing on or after 1 January 2016, nor to deferred tax assets associated with them.

The special regime applicable to deferred tax assets provides for an optional framework and with the possibility of subsequent waiver, under which:

- Expenses and negative equity variations with impairment losses on credits and with post-employment or long-term employee benefits covered by it are deducted, under the terms and conditions set out in the Corporate income tax Code and in relevant separate tax legislation, up to the limit of the taxable profit for the tax period determined before these deductions. Expenses and negative equity variations not deducted due to this limit are deducted in subsequent tax periods, with the same limit. In the BCP Group, deferred tax assets associated with expenses and negative equity variations under these conditions amount to EUR 980,582,000 (31 December 2024: EUR 1,152,769,000), of which EUR 753,314,000 relate to impairment losses on credits (31 December 2024: EUR 790,087,000) and EUR 227,268,000 relate to post-employment or long-term employee benefits (31 December 2024: EUR 362,682,000).

- In certain situations (those with negative net results in annual individual accounts or liquidation by voluntary dissolution, insolvency decreed by court or revocation of the respective authorisation), deferred tax assets covered by the Special Regime are converted into tax credits, in part or in full. In case of negative net income, the conversion is made according to the proportion between the amount of the negative net income for the period and the total of equity, a special reserve corresponding to 110% of the tax credit must be constituted and, simultaneously, conversion rights of equivalent value attributable to the State are also constituted. These rights that can be acquired by the shareholders upon payment to the State of the same value. Tax credits may be offset against tax debts of the beneficiaries (or an entity based in Portugal within the same prudential consolidation perimeter or included in the same group of entities for which are applied the Special Tax Regime for Groups of Companies) or repaid by the State. Since neither Banco Comercial Português nor Banco ActivoBank recorded net losses in the years 2015 to 2024, there was no conversion of deferred taxes assets into tax credits, under the terms provided for in the Special Regime.

Pursuant to the regime described, the recovery of deferred tax assets covered by the optional regime approved by Law 61/2014, of 26 August, is not dependent on future profits.

The above-mentioned legal framework was densified by Ordinance 259/2016, of 4 October, about the control and use of tax credits, and by the Ordinance No. 293-A/2016, of 18 November, which establishes the conditions and procedures for the acquisition by the shareholders of the referred rights of the State. Law 98/2019, of 4 September, establishes a deadline for the acquisition of the referred rights of the State by the shareholders, after which the Management Board of the issuing bank is obliged to promote the record of the capital increase by the amount resulting from the exercise of the conversion rights. According to this legislation, among other aspects, these rights are subject to a right of acquisition by the shareholders on the date of creation of the rights of the State, exercisable in periods that will be established by the Board of Directors until 3 years after the confirmation date of the conversion of the deferred tax asset into tax credit by the Portuguese Tax and Customs Authority. The issuing entity shall deposit in favour of the State the amount of the price corresponding to all the rights issued, within 3 months beginning from the confirmation date of the conversion of the deferred tax asset into tax credit. Such deposit shall be redeemed when and to the extent that the rights of the State are acquired by the shareholders or exercised by the State.

Deferred taxes are calculated based on the tax rates expected to be in force when the temporary differences are reversed, which correspond to the tax rates enacted or substantively enacted at the balance sheet date. The deferred tax assets and liabilities are presented on a net basis whenever, in accordance with applicable law, current tax assets and current tax liabilities can be offset with each other, and the deferred tax assets and liabilities related to income taxes levied by the same tax authority over the same taxable entity.

Under Law 45-A/2024, of 31 December, which approved the State Budget for 2025, the standard IRC rate was reduced from 21% to 20%.

The current tax rate for Banco Comercial Português, S.A. is analysed as follows:

	30 September 2025	31 December 2024
Income tax	20%	21%
Municipal surtax rate (on taxable net income)	1.5%	1.5%
State tax rate (on taxable net income)		
More than 1,500,000 to 7,500,000	3%	3%
From more than 7,500,000 to 35,000,000	5%	5%
More than 35,000,000	9%	9%

Law No. 64/2025, of 7 November, was published, which changes the general IRC (Corporate Income Tax) to 19%, 18% and 17% for tax periods beginning in 2026, 2027 and in or after 2028, respectively.

The deferred tax rate related to the Bank's tax losses as at 30 September 2025 is 20% (31 December 2024: 20%).

The average deferred tax rate associated with temporary differences of Banco Comercial Português, S.A. as at 30 September 2025 is 30.3% (31 December 2024: 30.3%).

The income tax rate in the other main countries where the Group operates is 19% in Poland and 32% in Mozambique.

The reporting period for tax losses carried forward in Poland and in Mozambique is 5 years.

Following the amendments provided for in Law 24-D/2022, of 30 December, within the scope of the State Budget for 2023, the time limit applicable to the carrying forward of tax losses in Portugal was eliminated. This amendment applies to tax losses assessed in tax periods beginning on or after 1 January 2023, as well as to tax losses calculated in tax periods prior to 1 January 2023 and whose deduction period is still in progress on that date. Thus, tax losses calculated in 2014 and subsequent years may be deducted from future taxable income. The deduction limit for tax losses reduced from 70% to 65%, being increased by ten percentage points when the difference results from the deduction of tax losses calculated in the 2020 and 2021 tax periods, under the terms of the special regime provided for in Law 27-A/2020, of 24 July.

Banco Comercial Português, S.A. applies the Special Tax Regime for Groups of Companies (RETGS) since 2016 for taxation purposes under corporate income tax (IRC), in which it's the dominant company. The remaining companies covered by the RETGS are Banco ActivoBank, S.A., Interfundos - Sociedade Gestora de Organismos de Investimento Coletivo, S.A., BCP África, S.G.P.S. Lda., Millennium bcp Participações, S.G.P.S., Sociedade Unipessoal Lda., Millennium bcp Teleserviços – Serviços de Comércio Electrónico, S.A., and, from 2024, Imoserit, S.A.

Regarding the activity in Portugal, Law No. 98/2019, of 4 September, established the tax regime for credit impairment losses and provisions for guarantees for tax periods beginning on or after 1 January 2019, providing for the approximation between the accounting and tax rules in what concerns the deductibility of credit impairment losses. The rules in force until 2018 could continue to be applied until the end of the 2023 financial year, unless the option to apply the new regime was exercised in advance.

In 2022, the Banco Comercial Português, S.A. and the Banco ActivoBank, S.A. exercised the option to apply the new regime, under the terms of which the impairment losses for credit risk relating to exposures analysed on an individual or on a collective basis, the provisions for guarantees and other commitments, and the impairment losses on debt instruments at amortised cost or at fair value through Other Comprehensive Income, recognised in accordance with the applicable accounting standards and regulations are fully deductible for the purposes of determining taxable profit, with the exceptions provided for in the Corporate Income Tax Code. The exceptions apply to impairment losses relating to credits and other rights over natural or legal persons who hold, directly or indirectly, more than 10 % of the Bank's capital, over members of its corporate bodies, over companies in which the Bank holds, directly or indirectly, more than 10 % of the capital or over entities with which it is in a situation of special relations.

Impairment losses and other value corrections for specific credit risk recorded until 31 December 2021 and still not deducted for tax purposes are only deductible up to the amount that, in each tax period, corresponds to the application of the mandatory minimum limits set out in Notice of Banco de Portugal No. 3/95, as amended before its repeal by Notice of Banco de Portugal 5/2015 and, between other conditions, provided that they are not claims covered by real estate rights.

The Group complies with the guidelines of IFRIC 23 - Uncertainty over Income Tax Treatments on the determination of taxable profit, tax bases, tax losses to be reported, tax credits to be used and tax rates in scenarios of uncertainty regarding the income tax treatment, with no material impact on its financial statements resulting from its application.

Analysis of the recoverability of deferred tax assets

In accordance with the accounting policy 1 Y3 and with the requirements of IAS 12, the deferred tax assets were recognised based on the Group's expectation of their recoverability. The recoverability of deferred taxes depends on the implementation of the strategy of the Bank's Board of Directors, namely the generation of estimated taxable income and its interpretation of tax legislation. Any changes in the assumptions used in estimating future profits or tax legislation may have material impacts on deferred tax assets.

The assessment of the recoverability of deferred tax assets is based on the projected results for the period from 2025 to 2031, as longer forecast periods have higher underlying factors of uncertainty. The projected income before taxes for the years 2025, 2026, 2027 and 2028 are consistent with the budget approved by the Bank's Board of Directors in November 2024, which incorporates the priorities stemming from the 2025-2028 Strategic Plan. In the earnings forecast for the years 2029, 2030 and 2031, a standard nominal growth rate of 2% was considered.

The forecasts consider the conclusion of the monetary policy easing cycle in the Eurozone, with the stabilisation of interest rates at a lower level than the current one, and the development of the Bank's activity aligned with the commercial positioning and the targets enshrined in the 2025-2028 Strategic Plan approved by the governing bodies, highlighting:

- after reflecting the impacts of the normalisation of interest rates, net interest income benefits from the recovery of volumes in customer lending, especially to companies, with a focus on priority segments associated with customer knowledge and relationship, and continued growth of the deposit base, focusing on customer engagement and transactionality;
- increase in commission income based on an efficient and judicious management of commissions and price lists;
- stabilisation of cost of risk at levels in line with the Group's current activity, given the lower impact from the historical portfolios of NPEs, foreclosed assets and FRE (Corporate Restructuring Funds), after the reduction of these exposures achieved over the last years;
- strengthening of the capabilities required for the implementation of the initiatives foreseen in the 2025-2028 Strategic Plan, while preserving high levels of efficiency based on continued cost discipline and increased use of technology.

To estimate taxable net income for the periods of 2025 to 2031, the following main assumptions were considered:

- The rules of the new tax regime of credit impairment were applied. In the application of these rules, the following assumptions were considered, in general terms:

a) the impairment losses for credit risk related to exposures analysed on an individual or collective basis, recognised in accordance with the applicable accounting and regulatory standards, were considered deductible for tax purposes;

b) impairment reversals created up to 31 December 2021 not accepted for tax purposes were estimated based on the most recent Non-Performing Assets Reduction Plan (2024-2026), and also on the basis of the average percentage of reversal observed in the last years from 2016 to 2024;

c) the referred average percentages were calculated separately, depending on whether or not there was a mortgage guarantee, the eligibility for purposes of the special regime applicable to deferred tax assets and according to the customers' classification as Non-Performing Exposures (NPE).

- The deductions related to impairment of financial assets were projected based on the destination (sale or settlement) and the estimated date of the respective operations;

- Impairment reversals of non-financial assets not accepted for tax purposes were projected considering the expected periods of disinvestment in certain real estate assets. For the remaining assets without a forecasted term for disinvestment, the reversals were estimated based on the average percentage of reversal observed in the years from 2016 to 2024. Non-deductible expenses related to the reinforcement of impairment of non-financial assets were estimated on the basis of the average percentage of amounts not deducted for tax purposes in the years from 2016 to 2024, compared to the amounts of reinforcements net of impairment recorded in those years;

- The deductions related to employee benefits were projected based on their estimated payments or deduction plans, in accordance with information provided by the pension fund actuary;

- The realisation of changes in the fair value of real estate investment funds was projected based on the information available in the regulations of the funds in question in relation to the period foreseen for the respective liquidation.

According to the estimate of future taxable income, the deferred taxes assets recorded as at 31 December 2024 are adequate under the IAS 12 requirements. With reference to 30 September 2025, this analysis and conclusions remain valid.

In accordance with these assessments, the amount of unrecognised deferred tax related to temporary differences and to tax losses is as follows:

	(Thousands of euros)	
	30 September 2025	31 December 2024
Temporary differences	1,072	1,072
Tax losses carried forward		
2014	154,196	154,196
2015	2	2
2016	247,891	265,652
2017	2,641	2,347
2018	92,394	92,394
2019	25,500	25,500
2020	17,673	19,481
2021	172,783	172,782
2022	15,018	18,569
2023	2,841	3,851
2024	23,254	17,661
2025	13,858	—
Total	768,051	772,435

The amount of unrecognised deferred taxes relating to tax losses per expiry year is analysed as follows:

	(Thousands of euros)	
	30 September 2025	31 December 2024
2025	12,709	14,558
2026	131	131
2027	11,249	11,565
2028	886	1,008
2029	18,890	21,503
2030	13,633	—
No expiry date	710,553	723,670
Total	768,051	772,435

In addition to the above amounts, the Bank is contesting corrections to tax losses for 2014, 2016 and 2021, which, if granted, will increase the value of unrecognised deferred taxes assets by EUR 92,136,000.

The impact of income taxes in Net income and in other balances of Group's equity, as at 30 September 2025, is analysed as follows:

(Thousands of euros)

	30 September 2025		
	Net income for the period	Reserves	Exchange rate differences
Deferred taxes not depending on the future profits			
Impairment losses	(39,127)	—	—
Employee benefits	(143,266)	—	—
	(182,393)	—	—
Deferred taxes depending on the future profits			
Impairment losses	(42,515)	(435)	1,002
Tax losses carried forward (a)	42,066	(33,833)	39
Employee benefits	(32,174)	1,678	15
Financial assets at fair value through other comprehensive income	—	(107,809)	(5,802)
Derivatives	2,796	—	(45)
Intangible assets	5	—	4
Other tangible assets	643	—	(4)
Others	(27,601)	(1,843)	6,017
	(56,780)	(142,242)	1,226
	(239,173)	(142,242)	1,226
Current taxes			
Current period	(97,020)	—	—
Correction of previous periods	19,100	—	—
	(77,920)	—	—
	(317,093)	(142,242)	1,226

(a) The amount recorded in reserves refers to the deferred tax on the part of tax loss arising from the deduction of negative equity changes recorded in reserves that contribute to the calculation of taxable income.

The impact of income taxes in Net income and in other balances of Group's equity, as at 30 September 2024, is analysed as follows:

(Thousands of euros)

	30 September 2024		
	Net income for the period	Reserves	Exchange rate differences
Deferred taxes not depending on the future profits			
Impairment losses	(28,346)	—	—
Employee benefits	(155,876)	(507)	—
	(184,222)	(507)	—
Deferred taxes depending on the future profits			
Impairment losses	66,557	(1,334)	2,721
Tax losses carried forward (a)	(19,468)	8,582	122
Employee benefits	(2,770)	1,300	79
Financial assets at fair value through other comprehensive income	—	(112,965)	(5,743)
Derivatives	69	—	(112)
Intangible assets	47	—	14
Other tangible assets	166	—	(5)
Others	(18,048)	(2,395)	5,058
	26,553	(106,812)	2,134
	(157,669)	(107,319)	2,134
Current taxes			
Current period	(114,973)	(751)	—
Correction of previous periods	9,835	—	—
	(105,138)	(751)	—
	(262,807)	(108,070)	2,134

(a) The amount recorded in reserves refers to the deferred tax on the part of tax loss arising from the deduction of negative equity changes recorded in reserves that contribute to the calculation of taxable income.

The reconciliation between the nominal tax rate and the effective tax rate is analysed as follows:

	(Thousands of euros)	
	30 September 2025	30 September 2024
Income before taxes	1,201,710	1,055,792
Current tax rate (%)	30.5%	31.5%
Tax at the applicable tax rate	(366,522)	(332,574)
Non-deductible impairment and provisions (a)	(23,137)	(36,203)
Mandatory contributions on the banking sector (b)	(22,406)	(18,975)
Results of companies accounted by the equity method	13,627	13,799
Interests on other equity instruments (c)	7,434	8,033
Effect of the tax rate difference (d)	55,116	28,824
Effect of recognition/derecognition net of deferred taxes (e)	(3,873)	63,913
Non-deductible costs and other corrections	5,562	(1,961)
Correction of previous periods	9,844	7,230
Impact of the special regime for the taxation of groups of companies	7,640	5,610
Autonomous taxation	(378)	(503)
Total	(317,093)	(262,807)
Effective rate (%)	26.4%	24.9%

(a) In 2025 includes the negative amount of EUR 49,052,000 (2024: negative EUR 35,745,000) related to the impact of the non-deductibility for tax purposes of the provisions related to legal risks associated with the mortgages portfolio granted in foreign currency by Bank Millennium.

(b) Following the favourable court ruling handed down in the proceeding of legal pleading of the Additional Solidarity for the Banking Sector paid by the Bank in 2020, 2021 and 2022, and the respective unappealable decision, the amount of EUR 18,595,000 was recognised as income in the 2025. At the beginning of July and November 2025, the amounts relating to 2021 and 2022 were refunded to the Bank. It is estimated that the amount relating to 2020 will be refunded by the end of the year.

In the sequence of constitutional court judgement no. 478/2025 issued on 3 June 2025, that declared unconstitutionality with mandatory general legal enforcement of Additional Solidarity on the Banking Sector Regime, the Bank did not proceed with the self-assessment and payment of the tax which, under the rules previously in force, would have been due by 30 June 2025.

(c) Relates to the impact of the deduction for taxable income purposes of interest paid in respect of perpetual bonds representing subordinated debt issued in 31 January 2019 and 18 January 2024.

(d) In 2025, this balance includes the amount of EUR 13,197,000 (2024: EUR 14,076,000) related with the effect of the taxation of 20% tax on interests of Mozambique's public debt securities and the amount of EUR 38,284,000 (2024: EUR 16,374,000) related to the effect of the difference in the tax rate on taxable profits in Poland, which is 19%, on a income before taxes.

(e) In 2025, includes the amount of EUR 21,504,000 of deferred taxes assets recognised by BCP relating to tax losses and the negative amount of EUR 13,633,000 relating to the non-recognition of deferred tax assets on the 2025 tax loss of Banco Internacional de Moçambique.

In 2024, it includes the amount of EUR 21,504,000 relating to the additional recognition of deferred tax assets by Banco Comercial Português relating to credit impairment not deducted for tax purposes in previous years and the recognition of deferred tax assets of EUR 51,621,000 by Bank Millennium relating to future adjustments of income (interest, commissions and exchange gains) obtained on foreign currency-indexed mortgages and mortgage contracts granted in foreign currency (in particular in Swiss francs) subject to legal disputes for their cancellation, and the negative amount of Euros 9,041,000 relating to the non-recognition of deferred tax assets on the tax loss of Banco Internacional de Moçambique.

Directive (EU) 2022/2523 of the Council, of 15 December 2022 – Minimum level of taxation of 15% per jurisdiction

Under Pillar 2 of the Base Erosion and Profit Shifting 2.0 ("BEPS 2.0") project of the Organisation for Economic Co-operation and Development ("OECD"), enshrined in Council Directive (EU) 2022/2523 of 15 December 2022, multinationals enterprises and large national groups with consolidated annual revenues of more than EUR 750 million in at least two of the last four financial years, will become subject, as of the 2024 financial year, to a minimum level of taxation of 15% in each of the jurisdiction they operate.

Directive (EU) 2022/2523, on ensuring a worldwide minimum level of taxation for multinational companies groups and large national groups within the Union, was transposed into domestic legislation in Portugal, through Law 41/2024, of 8 November. In Poland, the transposition of this Directive took place on 15 November 2024.

The regime in question may determine the payment of a top-up tax when a minimum level of taxation of 15% is not observed, on a jurisdictional basis.

According to the analysis carried out on the potential future impacts of this regime, the Group estimates that it will meet, in the jurisdictions in which it operates, namely in Portugal, Poland and Mozambique, the necessary requirements for the application of "transitional safe harbours", thus being excluded, between 2024-2026, from the obligation to calculate any top-up tax.

32. Other assets

This balance is analysed as follows:

	(Thousands of euros)	
	30 September 2025	31 December 2024
Deposit account applications	62,838	58,404
Shareholder Loans	125,376	121,188
Surplus in the post-employment benefits	263,031	148,229
Debtors for futures and options transactions	207,453	151,776
Real estate and other assets arising from recovered loans	236,407	293,150
Debtors		
Residents		
Receivables from real estate, transfers of assets and other securities	52,586	57,446
Prosecution cases / agreements with the Bank	8,762	8,795
SIBS	2,170	2,770
Others	23,353	34,182
Non-residents	34,703	23,890
Amounts due for collection	59,717	113,333
Interest and other amounts receivable	83,748	84,653
Amounts receivable on trading activity	393,358	1,584
Amounts due from customers	12,134	103,144
Artistic assets	28,795	28,796
Prepaid expenses	37,061	26,716
Subsidies receivables	11,548	14,908
Other taxes recoverable	19,823	7,878
Gold and other precious metals	3,751	3,693
Capital supplementary contributions	165	165
Associates	191	489
Others	583,004	455,953
	2,249,974	1,741,142
Impairment for other assets	(273,167)	(276,896)
	1,976,807	1,464,246

The balance Amounts receivable on trading activity corresponds to operations awaiting financial settlement, which has already occurred on the date these accounts were approved.

The detail of the item Real estate and other assets arising from recovered loans is analysed as follows:

(Thousands of euros)						
	30 September 2025			31 December 2024		
	Gross value	Impairment	Net value	Gross value	Impairment	Net value
Real estate						
Assets arising from recovered loans	67,437	(38,151)	29,286	118,564	(49,917)	68,647
Assets belong to investments funds and real estate companies	135,359	(77,357)	58,002	137,598	(77,518)	60,080
Assets for own use (closed branches)	12,850	(5,101)	7,749	12,328	(4,817)	7,511
Equipment	12,990	(9,414)	3,576	14,792	(9,204)	5,588
Other assets (*)	7,771	—	7,771	9,868	(19)	9,849
	236,407	(130,023)	106,384	293,150	(141,475)	151,675

(*) includes Shares, Price Deposit and Property Adjudication Proposals

The changes occurred in Impairment of other assets, with the exception of impairment for Real estate and other assets arising from recovered loans are analysed as follows:

(Thousands of euros)		
	30 September 2025	31 December 2024
Balance as at 1 January	135,421	184,992
Other transfers	705	(113)
Charge for the period (note 13)	10,524	18,407
Reversals for the period (note 13)	(2,945)	(5,339)
Amounts charged-off	(166)	(62,825)
Exchange rate differences	(395)	299
Balance at the end of the period	143,144	135,421

The changes occurred in impairment for Real Estate and other assets arising from recovered loans, are analysed as follow:

(Thousands of euros)		
	30 September 2025	31 December 2024
Balance as at 1 January	141,475	136,840
Other transfers	(13,431)	(8,461)
Charge for the period (note 13)	8,140	33,875
Reversals for the period (note 13)	(223)	(407)
Amounts charged-off	(2,530)	(21,891)
Exchange rate differences	(3,408)	1,519
Balance at the end of the period	130,023	141,475

33. Deposits from credit institutions and other funds

This balance is analysed as follows:

(Thousands of euros)						
	30 September 2025			31 December 2024		
	Non-interest bearing	Interest bearing	Total	Non-interest bearing	Interest bearing	Total
Deposits from Central Banks and other funds						
Central Banks abroad	—	186,170	186,170	—	116,330	116,330
Deposits from credit institutions in Portugal and other funds						
Very short-term deposits	—	72,348	72,348	—	30,908	30,908
Sight deposits	57,685	—	57,685	80,839	—	80,839
Term Deposits	—	107,548	107,548	—	187,655	187,655
	57,685	179,896	237,581	80,839	218,563	299,402
Deposits from credit institutions abroad and other funds						
Very short-term deposits	—	36,346	36,346	—	—	—
Demand deposits	82,722	—	82,722	65,217	—	65,217
Term deposits	—	94,363	94,363	—	139,446	139,446
Loans obtained	—	586	586	—	817	817
CIRS and IRS operations collateralised by deposits (*)	30,593	—	30,593	105,027	—	105,027
Sales operations with repurchase agreement	—	760,300	760,300	—	45,414	45,414
Other	—	6,585	6,585	—	6,066	6,066
	113,315	898,180	1,011,495	170,244	191,743	361,987
	171,000	1,264,246	1,435,246	251,083	526,636	777,719

(*) Under the scope of transactions involving derivative financial instruments (IRS and CIRS) with institutional counterparties, and in accordance with the terms of their respective agreements ("Cash collateral"). These deposits are held by the Group and are reported as collateral for the referred operations (IRS and CIRS), whose revaluation is positive.

34. Deposits from customers and other funds

This balance is analysed as follows:

(Thousands of euros)						
	30 September 2025			31 December 2024		
	Non-interest bearing	Interest bearing	Total	Non-interest bearing	Interest bearing	Total
Deposits from customers						
Repayable on demand	50,056,219	878,371	50,934,590	47,313,543	598,911	47,912,454
Term deposits	—	29,108,047	29,108,047	—	29,300,652	29,300,652
Saving accounts	—	4,507,048	4,507,048	—	4,063,719	4,063,719
Treasury bills and other assets sold under repurchase agreement	—	999,614	999,614	—	—	—
Cheques and orders to pay	567,380	—	567,380	469,282	—	469,282
	50,623,599	35,493,080	86,116,679	47,782,825	33,963,282	81,746,107
Corrections to the liabilities value subject to hedging operations			106,816			158,201
Interests payable			126,324			180,379
			86,349,819			82,084,687

In the terms of the Law, the Deposit Guarantee Fund was established to guarantee the repayment of funds deposited in Credit Institutions. The criteria to calculate the annual contributions to the Portuguese fund are defined in the Regulation 11/94 of the Banco de Portugal.

35. Non-subordinated debt securities issued

This balance is analysed as follows:

(Thousands of euros)		
	30 September 2025	31 December 2024
Bonds	568,617	393,113
Medium term notes (MTN)	3,497,544	2,995,028
Securitisations	94,771	106,331
	4,160,932	3,494,472
Corrections to the liabilities value subject to hedging operations	(6,519)	(5,507)
Deferred costs / (gains)	(10,125)	(10,403)
Interests payable	63,808	50,148
	4,208,096	3,528,710

On 24 June 2025, the Bank carried out a new issue under the MTN program in the amount of EUR 500 million with a maturity of 6 years, as refer in note 48.

36. Subordinated debt

This balance is analysed as follows:

	(Thousands of euros)	
	30 September 2025	31 December 2024
Bonds		
Non-Perpetual	1,378,772	1,407,796
Corrections to the liabilities value subject to hedging operations	(5,173)	(17,808)
Deferred costs / (income)	(2,064)	(1,142)
Interests payable	34,522	38,513
	1,406,057	1,427,359

37. Financial liabilities held for trading

This balance is analysed as follows:

	(Thousands of euros)	
	30 September 2025	31 December 2024
Short sales	116,914	44,607
Trading derivatives (note 24)		
Swaps	111,177	84,308
Options	29,252	45,140
of which: Embedded derivatives	28,180	42,477
Forwards	7,477	5,572
	147,906	135,020
	264,820	179,627

38. Financial liabilities designated at fair value through profit or loss

This balance is analysed as follows:

	(Thousands of euros)	
	30 September 2025	31 December 2024
Deposits from customers (*)	2,005,234	1,956,851
Certificates	1,468,026	1,292,006
	3,473,260	3,248,857

(*) Deposits from customers whose remuneration is indexed to a set of shares and/or indices.

39. Provisions

This balance is analysed as follows:

	(Thousands of euros)	
	30 September 2025	31 December 2024
Provision for guarantees and other commitments	124,956	118,039
Other provisions for liabilities and charges	1,122,540	967,819
	1,247,496	1,085,858

Changes in Provisions for guarantees and other commitments are analysed as follows:

	(Thousands of euros)	
	30 September 2025	31 December 2024
Balance as at 1 January	118,039	121,574
Transfers	—	(1,105)
Charge for the period (note 14)	43,708	34,826
Reversals for the period (note 14)	(36,624)	(37,481)
Exchange rate differences	(167)	225
Balance at the end of the period	124,956	118,039

Changes in Other provisions for liabilities and charges are analysed as follows:

	(Thousands of euros)	
	30 September 2025	31 December 2024
Balance as at 1 January	967,819	631,529
Transfers	(377)	(9,801)
Charge for the period (note 14)	407,063	588,351
Reversals for the period (note 14)	(5,104)	(4,672)
Amounts charged-off	(226,295)	(171,771)
Allocation to loan's portfolio (note 22)	(18,143)	(75,275)
Exchange rate differences	(2,423)	9,458
Balance at the end of the period	1,122,540	967,819

The balance Other provisions for liabilities and charges - Charge for the period refers essentially to provisions for legal risk accounted for by Bank Millennium, related to foreign currency-indexed mortgage loans, as described in note 53, which amounted to EUR 355,082,000 (31 December 2024: EUR 506,195,000).

Provisions for legal risk related to foreign currency-indexed mortgage loans in Bank Millennium (Poland)

Bank Millennium estimated the impact of legal risk on the recoverability of the expected cash flows resulting from concluded contracts for the active portfolio of mortgage loans in CHF, adjusting, in accordance with point B5.4.6 of IFRS 9, the gross carrying amount of the portfolio by reducing the expected cash flows from mortgage loan contracts denominated or indexed to CHF, and recognised a provision in accordance with International Accounting Standard 37 Provisions, Contingent Liabilities and Contingent Assets ("IAS 37") for fully repaid loans and in a situation where the gross carrying amount of the loan was lower than the value of the assessed risk.

A detailed description of the adopted valuation methodology is presented in note 53 "Legal risk related to foreign currency mortgage loans in Bank Millennium (Poland)".

As at 30 September 2025, the Loans and advances to customers portfolio in CHF has a gross amount of EUR 1,228,606,000 (31 December 2024: EUR 1,642,802,000).

As at 30 September 2025, the provisions estimated by Bank Millennium to address the legal risk related to foreign currency-indexed mortgage loans amount to EUR 1,831,034,000 (PLN 7,805,880,000), of which EUR 1,049,450,000 (PLN 4,473,909,000) are presented under assets, as a deduction from the gross amount of the loan portfolio in CHF (note 22) and EUR 781,584,000 (PLN 3,331,971,000) are presented under Provisions.

As at 31 December 2024, the provisions estimated by Bank Millennium to address the legal risk related to foreign currency-indexed mortgage loans amounted to EUR 1,979,025,000 (PLN 8,463,696,000), of which EUR 1,324,672,000 (PLN 5,665,224,000) are presented under assets, as a deduction from the gross amount of the loan portfolio in CHF (note 22) and EUR 654,353,000 (PLN 2,798,472,000) are presented under Provisions.

The variation in the level of provisions or concrete losses will depend on the final court decisions about each case and on the number of court cases, as described in accounting policy 1 Y7 and note 53.

40. Other liabilities

This balance is analysed as follows:

	(Thousands of euros)	
	30 September 2025	31 December 2024
Interests and other amounts payable	215,352	193,967
Operations to be settled - foreign, transfers and deposits	188,829	240,727
Credit insurance received and to accrued	8,031	26,675
Holidays, subsidies and other remuneration payable	72,433	59,576
Transactions on securities to be settled	295,844	2,757
Public sector	38,227	53,902
Creditors		
Rents to pay	188,305	209,110
Deposit account and other applications	103,250	124,872
Suppliers	28,907	56,896
From factoring operations	35,514	21,882
For futures and options transactions	39,669	13,533
Liabilities not covered by the Group Pension Fund - amounts payable by the Group	7,239	8,780
Associates	—	14
Other creditors		
Residents	35,337	45,016
Non-residents	80,383	71,290
Deferred income	12,297	12,065
Other administrative costs payable	5,884	3,447
Other liabilities	372,051	291,236
	1,727,552	1,435,745

The balance Amounts payable on trading activity corresponds to transactions awaiting financial settlement.

41. Share capital, Share premium and Other equity instruments

As at 30 September 2025, the Bank's share capital amounts to EUR 3,000,000,000 and is represented by 15,113,989,952 nominative book-entry shares without nominal value, fully subscribed and paid up.

As at 30 September 2025, Share premium amounts to EUR 16,470,667.11, corresponding to the difference between the issue price (EUR 0.0834 per share) and the issue value (EUR 0.08 per share) determined under the scope of the Exchange Offer occurred in June 2015.

As at 30 September 2025, Other equity instruments in the amount of EUR 400,000,000 corresponds to 2,000 perpetual subordinated notes issued on 18 January 2024, with a nominal value of EUR 200,000 each which was classified as Additional Tier 1 (AT1) in accordance with the specific rules of IAS 32 and accounting policy 1 E. The issue has the option of early repayment by the Bank from the end of 5th year onwards with a coupon of 8.125% per year for the first 5.5 years, which will be refixed from that date every 5 years, with reference to the then prevailing 5-year mid-swap rate plus a spread of 5.78% a year. As the operation is classified as AT1, the corresponding interest payment can be cancelled by the Bank at its discretion or by imposition of the competent authorities and is still subject to compliance with a set of conditions, including compliance with the combined capital reserve requirement and the existence of sufficient distributable funds.

The Bank also decided, in accordance with its terms and conditions, to exercise the option of early repayment of the entire AT1 issue issued on 31 January 2019 in the amount of EUR 400,000,000. The early repayment took place on their first call date, 31 January 2024, at the nominal value plus the respective accrued interests.

42. Legal and statutory reserves

Under the Portuguese legislation, the Bank is required to annually set-up a legal reserve equal to a minimum of 10% of annual profits until the reserve equals the share capital, or until the sum of the free reserves constituted and the retained earnings, if higher. In accordance with the proposal for the appropriation of net income for the 2024 financial year approved at the General Shareholders' Meeting held on 22 May 2025, the Bank increased its legal reserves in the amount of EUR 80,257,000, thus, as at 30 September 2025 the Legal Reserves amount to EUR 464,659,000 (31 December 2024: EUR 384,402,000).

In accordance with the current Portuguese legislation, the Group companies must set-up annually a reserve with a minimum percentage between 5% and 20% of their net annual profits depending on the nature of their economic activity and are recognised in Other reserves and retained earnings in the Bank's consolidated financial statements (note 44).

43. Treasury shares

This balance is analysed as follows:

	30 September 2025		
	Net book value (EUR '000)	Number of securities	Average book value (Euros)
Banco Comercial Português, S.A. shares	200,000	309,362,863	0.646

On 8 April 2025, the Bank approved a share buyback programme in the total amount of EUR 200,000,000, equivalent to approximately 2,683% of BCP's market capitalisation (the "Buy-Back Programme").

The objective of the Buy-Back Programme, for the purposes of Article 5(2)(a) of Regulation (EU) 596/2014, is the cancellation of treasury shares acquired under its scope and it will be implemented in accordance with the provisions of Regulation (EU) 596/2014, as supplemented by Delegated Regulation (EU) 2016/1052, taking into consideration the terms and conditions described below, and also being conditional to: (i) the limits set out in the resolution adopted under item 6 of the Agenda of the General Meeting held on 22 May 2024, as duly disclosed to the market; (ii) the terms and conditions of any future authorisations for the acquisition of treasury shares that may be approved by the General Meeting of Shareholders of BCP; and (iii) the terms and conditions of any share capital reduction that may be resolved for these purposes by the General Meeting of Shareholders.

In this context, the Programme was approved in accordance with the following terms and conditions:

- Maximum number of shares to be acquired under the Buy-Back Programme: up to 755,699,497 ordinary shares of BCP, corresponding to up to 5% of the total shares representing its share capital. This is the maximum number of shares that may be cancelled in the context of the Buy-Back Programme, under the terms of a resolution approved at the General Meeting.
- Maximum pecuniary amount of the Buy-Back Programme: up to EUR 200,000,000;
- Duration of the Buy-Back Programme: the Buy-Back Programme began on 14 April 2025 and ended on 14 October 2025 (inclusive), without prejudice, namely, of the possibility of ending earlier following a decision by the Bank or should the maximum number of shares to be acquired or the maximum pecuniary amount of the Buy-Back Programme were reached.
- Forms of acquisition under the Buy-Back Programme: acquisitions of shares or rights to acquire or allocate shares, for consideration, in trading sessions on the Euronext Lisbon regulated market, in compliance with the principle of shareholder equality as required by law, according to criteria whereby any shareholder status is not considered a relevant factor.

On 25 August 2025, the Buy-back Program ended, with the Bank acquiring 309,362,863 BCP shares at a average unit cost of 0.646 euros, for a total amount of EUR 200,000,000.

The own shares held by the companies included in the consolidation perimeter are within the limits established by the Bank's by-laws and by the Commercial Companies Code.

As at 30 September 2025, in compliance with the provisions of Article 324(1)(b) of the Commercial Companies Code, the Bank maintains a reserve of a equivalent amount of its own shares, of EUR 200,000,000 recognised under the heading of Other Reserves and Retained Earnings (note 44).

4.4. Reserves and retained earnings

This balance is analysed as follows:

	(Thousands of euros)	
	30 September 2025	31 December 2024
Changes in fair value - Gross amount		
Financial assets at fair value through other comprehensive income (note 24)		
Debt instruments (*)	47,879	409
Equity instruments	(1,279)	(1,051)
Of associates and other changes	19,827	5,556
Cash-flow hedge	(572,070)	(876,708)
From financial liabilities designated at fair value through profit or loss related to changes in own credit risk	1,240	(660)
	(504,403)	(872,454)
Changes in Fair value - Tax		
Financial assets at fair value through other comprehensive income		
Debt instruments	(12,106)	440
Equity instruments	731	655
Cash-flow hedge	173,231	265,315
From financial liabilities designated at fair value through profit or loss related to changes in own credit risk	(376)	200
	161,480	266,610
	(342,923)	(605,844)
Exchange rate differences arising on consolidation		
Bank Millennium, S.A.	(19,723)	(21,946)
BIM - Banco Internacional de Moçambique, S.A.	(171,942)	(128,243)
Banco Millennium Atlântico, S.A.	(188,694)	(181,875)
Others	1,674	1,591
	(378,685)	(330,473)
Application of IAS 29		
Effect on equity of Banco Millennium Atlântico, S.A.	52,381	50,964
Others	(3,965)	(3,965)
	48,416	46,999
Other reserves and retained earnings	3,711,480	3,276,910
	3,038,288	2,387,592

(*) Includes the effects arising from the application of hedge accounting.

The changes in fair value correspond to the accumulated changes of the Financial assets at fair value through other comprehensive income and Cash flow hedge, in accordance with the accounting policy presented in note 1 C.

The variation in the fair value of cash flow hedges reflects the economic impact on these hedges of the pronounced increase in market interest rates, an effect that is more than offset by the economic impact on the fair value of liabilities that are more sensitive to such an increase and that are accounted for at amortised cost.

As at 30 September 2025, in compliance with the provisions of Article 324(1)(b) of the Commercial Companies Code, the Bank maintains a reserve in a equivalent amount of its own shares (note 43) of EUR 200,000,000 recognised under the heading of Other Reserves and Retained Earnings.

45. Non-controlling interests

This balance is analysed as follows:

	(Thousands of euros)	
	30 September 2025	31 December 2024
Changes in fair value		
Debt instruments	15,360	(7,277)
Equity instruments	4,081	4,059
Cash-flow hedge	(934)	(2,889)
Other	7	4
	18,514	(6,103)
Deferred taxes		
Debt instruments	(2,670)	1,922
Equity instruments	(785)	(783)
Cash-flow hedge	177	549
	(3,278)	1,688
	15,236	(4,415)
Exchange rate differences arising on consolidation	(130,986)	(111,335)
Actuarial losses (net of taxes)	(153)	(156)
Other reserves and retained earnings	1,322,253	1,213,620
	1,206,350	1,097,714

The balance Non-controlling interests is analysed as follows:

	(Thousands of euros)			
	Balance Sheet		Income Statement	
	30 September 2025	31 December 2024	30 September 2025	30 September 2024
Bank Millennium Group	1,030,933	906,757	100,810	63,389
BIM - Banco Internacional de Moçambique Group	164,541	179,502	8,470	21,191
Other subsidiaries	10,876	11,455	(578)	(5,370)
	1,206,350	1,097,714	108,702	79,210

46. Guarantees and other commitments

This balance is analysed as follows:

	(Thousands of euros)	
	30 September 2025	31 December 2024
Guarantees granted		
Guarantees	3,982,650	3,958,506
Stand-by letter of credit	72,877	90,380
Open documentary credits	256,897	219,509
Bails and indemnities	9,745	9,865
	4,322,169	4,278,260
Commitments to third parties		
Irrevocable commitments		
Term deposit contracts	43,432	81
Irrevocable credit facilities	5,621,769	5,359,955
Securities subscription	11,575	14,949
Other irrevocable commitments	106,889	109,004
Revocable commitments		
Revocable credit facilities	6,191,490	6,488,735
Bank overdraft facilities	1,001,856	1,022,545
Other revocable commitments	209,285	131,243
	13,186,296	13,126,512
Guarantees received	27,438,020	27,329,443
Commitments from third parties	12,771,052	11,715,068
Securities and other items held for safekeeping	98,078,356	86,897,547
Securities and other items held under custody by the Securities Depository Authority	97,617,744	89,014,967
Other off-balance sheet accounts	162,412,013	144,802,013

The guarantees granted by the Group may be related to loans transactions, where the Group grants a guarantee in connection with a loan granted to a customer by a third entity. According to its specific characteristics it is expected that some of these guarantees expire without being executed and therefore these transactions do not necessarily represent a cash-outflow. The estimated liabilities are recorded under provisions (note 39).

Stand-by letters and open documentary credits aim to ensure the payment to third parties from commercial deals with foreign entities and therefore financing the shipment of the goods. Therefore, the credit risk of these transactions is limited since they are collateralised by the shipped goods and are generally short-term operations.

Irrevocable commitments are non-used parts of credit facilities granted to corporate or retail customers. Many of these transactions have a fixed term and a variable interest rate and therefore the credit and interest rate risk are limited.

The financial instruments accounted as guarantees and other commitments are subject to the same approval and control procedures applied to the credit portfolio, namely regarding the analysis of objective evidence of impairment, as described in the accounting policy in note 1.C. The maximum credit exposure is represented by the nominal value that could be lost related to guarantees and commitments undertaken by the Group in the event of default by the respective counterparties, without considering potential recoveries or collaterals.

47. Transfers of assets

The Group performed a set of transactions of sale of financial assets (namely loans and advances to customers) for Funds specialised in the recovery of loans. These funds take the responsibility for management of the borrower companies or assets received as collateral with the objective of ensuring a pro-active management through the implementation of plans to explore/increase the value of the companies/assets.

The specialised funds in credit recovery that acquired the financial assets are closed funds, in which the holders of the investment units have no possibility to request the repayment of its investment units throughout the useful life of the fund. These investment units are held by several banks, which are the sellers of the loans, in percentages that vary through the useful life of the Funds, ensuring however that, separately, none of the banks hold more than 50% of the capital of the Fund.

The Funds have a specific management structure (General Partner), fully independent from the assignor banks and that is selected on the date of establishment of the Fund. The management structure of the Fund has as main responsibilities to: (i) determine the objective of the Fund and (ii) administrate and manage exclusively the Fund, determining the objectives and investment policy and the conduct in management and business of the Fund. The management structure is remunerated through management commissions charged to the Funds.

These funds (in which the Group holds minority positions) establish companies in order to acquire the loans to the banks, which are financed through the issuance of senior and junior securities. The value of the senior securities fully subscribed by the Funds that hold the share capital match the fair value of the asset sold, determined in accordance with a negotiation based on valuations performed by both parties.

The value of the junior securities is equivalent to the difference between the fair value that was based on the valuation of the senior security and the value of the transferred receivables. These junior securities, being subscribed by the Group, will entitle the Group to a contingent positive value if the value of the assets transferred exceeds the amount of the senior tranches plus the remuneration on them. Thus, considering these junior assets reflect a difference between the valuations of the assets sold based on the appraisals performed by independent entities and the negotiation between the parties, the Group performs the constitution of impairment losses for all of them.

Therefore, as a result of the transfer of assets occurred operations, the Group subscribed:

- Senior securities (investment units) of the funds, for which the cash-flows arise mainly from a set of assets transferred from the participant banks. These securities are booked in Financial assets not held for trading mandatorily at fair value through profit or loss portfolio and are accounted for at fair value based on the last available Net assets value (NAV), as disclosed by the Management companies and audited at year end, still being analysed by the Bank;
- Junior securities (with higher subordination degree) issued by the Portuguese law companies held by the funds and which are fully provided to reflect the best estimate of impairment of the financial assets transferred.

Within this context, not withholding control but maintaining an exposure to certain risks and rewards, the Group, in accordance with IFRS 9 3.2 performed an analysis of the exposure to the variability of risks and rewards in the assets transferred, before and after the transaction, having concluded that it does not hold substantially all the risks and rewards. Considering that it does not hold control and does not exercise significant influence on the funds or companies' management, the Group performed, under the scope of IAS IFRS 9 3.2, the derecognition of the assets transferred and the recognition of the assets received.

The results were calculated on the date of transfer of the assets. During the first nine months of 2025 and in the financial year 2024, no credits were sold to corporate restructuring funds.

The amounts accumulated as at 30 September 2025, related to these operations, are analysed as follows:

	(Thousands of euros)			
	Assets transferred	Net assets transferred	Received value	Net gains / (losses)
Fundo Recuperação FCR (in liquidation) (a)	343,266	243,062	232,267	(10,795)
Fundo Aquarius FCR (b)	132,635	124,723	132,635	7,912
Discovery Real Estate Fund (b)	211,388	152,155	138,187	(13,968)
Fundo Vega FCR (c)	113,665	113,653	109,599	(4,054)
	800,954	633,593	612,688	(20,905)

The activity segments are as follows: a) Diversified; b) Real estate and tourism; and c) Real estate.

The amounts accumulated as at 31 December 2024, related to these operations, are analysed as follows:

	(Thousands of euros)			
	Assets transferred	Net assets transferred	Received value	Net gains / (losses)
Fundo Recuperação FCR (in liquidation) (a)	343,266	243,062	232,267	(10,795)
Fundo Aquarius FCR (b)	132,635	124,723	132,635	7,912
Discovery Real Estate Fund (b)	211,388	152,155	138,187	(13,968)
Fundo Vega FCR (c)	113,665	113,653	109,599	(4,054)
	800,954	633,593	612,688	(20,905)

The activity segments are as follows: a) Diversified; b) Real estate and tourism; and c) Real estate.

As at 30 September 2025 and 31 December 2024, the assets received under the scope of these operations are comprised of:

	(Thousands of euros)		
	30 September 2025		
	Fair value of Investment fund units (note 24)	Shareholder loans (note 32)	Total
Fundo Recuperação FCR (in liquidation)	3,000	—	3,000
Fundo Aquarius FCR	69,414	—	69,414
Discovery Real Estate Fund	172,953	—	172,953
Fundo Vega FCR	33,117	—	33,117
	278,484	—	278,484

	(Thousands of euros)		
	31 December 2024		
	Fair value of Investment fund units (note 24)	Shareholder loans (note 32)	Total
Fundo Recuperação FCR (in liquidation)	13,987	—	13,987
Fundo Aquarius FCR	88,876	—	88,876
Discovery Real Estate Fund	167,894	—	167,894
Fundo Vega FCR	32,471	—	32,471
	303,228	—	303,228

As at 30 September 2025 and 31 December 2024, the book value of the investment funds units is recorded under Financial assets not held for trading mandatorily at fair value through profit or loss (note 24) and considers the Fund's Global Net Asset Value (NAV) communicated by the Management Companies.

The balance Shareholder loans in the gross amount of EUR 118,019,000 (31 December 2024: EUR 113,840,000) has recorded an impairment of the same amount (note 32).

Project Crow

As part of the sale process called Project Crow concluded at the end of 2022, Banco Comercial Português, S.A. now holds an investment in a venture capital fund, in 2 real estate funds and in a company, as follows:

	(Thousands of euros)	
	30 September 2025	31 December 2024
Investments in associates (note 26)		
Fundo Turismo Algarve, FCR	40,926	41,045
Lusofundo - Fundo de Investimento Imobiliário Fechado (in liquidation)	16,648	19,175
Fundo Especial de Investimento Imobiliário Fechado Eurofundo (in liquidation)	3,055	4,305
	60,629	64,525

48. Relevant events occurred during the first nine months of 2025

BCP S.A. informed about decision to call the currently outstanding EUR500,000,000 Senior Preferred Fixed to Floating Rate Notes due October 2026 with an outstanding amount of 500 million euros

On 19 September, Banco Comercial Português, S.A. informed that it has decided to exercise its option to early redeem all of its EUR500,000,000 Senior Preferred Fixed to Floating Rate Notes due October 2026 (ISIN: PTBCP2OM0058), issued on 2 October 2023 under the EUR25,000,000,000 Euro Note Programme (the "Notes"), in accordance with condition 6(d) of the terms and conditions of the Notes and the final terms of the Notes. The early redemption of the Notes shall take place on the optional redemption date set out in the final terms of the Notes, 2 October 2025, at their outstanding principal amount together with accrued interest.

Banco Comercial Português, S.A. informed about Interim report on the transactions conducted under the Share Buy-Back Programme

On 25 August 2025, in the context of the Buy-Back Programme, the Bank informed that has, up until that date, purchased 309,362,863 shares for a price amounting to a total of EUR 200,000,000, holding on that date an aggregate total 309,362,863 own shares, representing 2.05% of its share capital.

These purchases are the last purchases to be made under the Buy-Back Programme, thus the programme being deemed as completed in accordance with its terms, as duly disclosed to the market in due course.

Banco Comercial Português, S.A. informed about 2025 EU-Wide Stress Test Results

On 1 August 2025, Banco Comercial Português, S.A. informed that it was subjected to the 2025 EU-wide stress test conducted by the European Banking Authority (EBA), in cooperation with the Banco de Portugal (BdP), the European Central Bank (ECB), and the European Systemic Risk Board (ESRB).

Banco Comercial Português, S.A. notes the announcements made today by the EBA on the EU-wide stress test and fully acknowledges the outcomes of this exercise, comprising 64 banks that together represent around 75% of total banking assets in the European Union.

The 2025 EU-wide stress test does not contain a pass-fail threshold and instead is designed to be used as an important source of information for the purposes of the Supervisory Review and Evaluation Process (SREP). The results will assist competent authorities in assessing Banco Comercial Português, S.A. ability to meet applicable prudential requirements under stressed scenarios.

The adverse stress test scenario was set by the ECB/ESRB and covers a three-year time horizon (2025-2027). The stress test has been carried out applying a static balance sheet assumption as of December 2024, and therefore does not take into account future business strategies and management actions. It is not a forecast of Banco Comercial Português, S.A. financial evolution.

Considering the results of Banco Comercial Português, S.A. in the stress test, it should be highlighted the following:

- the application of the adverse scenario resulted in a reduction of 228 b.p. at the end of 2025, 152 b.p. at the end of 2026 and of 100 b.p. at the end of 2027 compared to the CET1 fully loaded restated (CRR3) capital ratio of 2024, which compares with an average reduction in the universe of the 64 banks submitted to this exercise, of 260 b.p. at the end of 2025, 275 b.p. at the end of 2026 and 304 b.p. at the end of 2027.
- the application of the baseline scenario resulted in an increase of 129 b.p. in the fully loaded CET1 capital ratio at the end of 2025, 254 b.p. at the end of 2026 and of 279 b.p. at the end of 2027 compared to the CET1 fully loaded restated (CRR3) capital ratio of 2024, which compares with an average increase in the universe of the 64 banks submitted to this exercise, of 65 b.p. at the end of 2025, 113 b.p. at the end of 2026 and 128 b.p. at the end of 2027.

Banco Comercial Português, S.A. informed on notification by Banco de Portugal regarding MREL requirements

On 11 July 2025, Banco Comercial Português, S.A. ("BCP" or the "Bank") informed that it has been notified by Banco de Portugal, as the national resolution authority, about the update of its minimum requirement for own funds and eligible liabilities ("MREL" or "Minimum Requirement for own funds and Eligible Liabilities") as decided by the Single Resolution Board.

The resolution strategy applied continues to be that of a multiple point of entry ("MPE"). The MREL requirements to be met by BCP Group of Resolution (consisting of BCP, S.A., Banco ActivoBank, S.A. and all the subsidiary companies of BCP apart from Bank Millennium S.A. and Banco Internacional de Moçambique and their respective subsidiaries), with immediate application, is of:

- 24.89% of the total risk exposure amount ("TREA") to which adds further a combined buffer requirement ("CBR"), which also includes the "Countercyclical Capital Buffer" — CCyB and the "Systemic Risk Buffer" — SyRB, currently of 3.95%, thus corresponding to total requirements currently of 28.84%; and
- 6.86% of the leverage ratio exposure measure ("LRE").

Additionally, the Bank informed that is not subject to any subordination requirements.

In accordance with the regulations in force, MREL requirements could be annually updated by the competent authorities, and therefore these targets replace those previously set.

At the date of this announcement, BCP informed that it complies with the established MREL requirements, both as a percentage of the TREA (including the CBR) and as a percentage of the LRE.

Banco Comercial Português, S.A. informed about issue of senior preferred debt securities eligible for MREL

On 16 June 2025, Banco Comercial Português, S.A. ("Bank") hereby informed that it has set the terms for a new issue of senior preferred debt securities eligible for MREL (Minimum Requirement for own funds and Eligible Liabilities), under its Euro Note Programme.

The issue, in the amount of EUR 500 million, will have a tenor of 6 years, with the option of early redemption by the Bank at the end of year 5, an issue price of 99.631% and an annual interest rate of 3.125% during the first 5 years (corresponding to a spread of 0.95% over the 5-year mid-swap rate). The interest rate for the year 6 was set at 3-month Euribor plus a 0.95% spread.

Bank Millennium Minimum requirements for own funds and liabilities subject to write down or conversion (MREL)

Bank Millennium manages MREL indicators in a manner analogous to capital adequacy management.

In terms of the MREL-TREA and MREL-TEM requirements, Bank Millennium Group has a surplus compared to the minimum required levels as at 30 September 2025, and also meets the MREL-TREA Requirement after the inclusion of the Combined Buffer Requirement.

MREL	30.09.2025	30.06.2025	31.12.2024
MREL-TREA ratio	25.51 %	25.27 %	28.06 %
Minimum required level MREL-TREA	15.36 %	15.36 %	18.03 %
Surplus(+) / Deficit(-) of MREL-TREA (p.p.)	10.15 p.p.	9.91 p.p.	10.03 p.p.
Minimum required level including Combined Buffer Requirement (CBR)	19.11 %	18.11 %	20.78 %
Surplus(+) / Deficit(-) of MREL-TREA+CBR (p.p.)	6.40 p.p.	7.16 p.p.	7.28 p.p.
MREL-TEM ratio	8.83 %	8.56 %	8.71 %
Minimum required level of MREL-TEM	5.91 %	5.91 %	5.91 %
Surplus(+) / Deficit(-) of MREL-TEM (p.p.)	2.92 p.p.	2.65 p.p.	2.80 p.p.

In May 2025, Bank Millennium received a letter from the Bank Guarantee Fund regarding the joint decision of the Single Resolution Board (SRB) and the BFG requiring that the Bank meet the communicated MREL-TREA requirements in the amount of 15.36% (previously 18.03% in the decision received June 2023) including 14.15% in subordinated instruments and MREL-TEM requirements in the amount of 5.91% (as in the decision received in 2024) including 5.54% in subordinated instruments.

Banco Comercial Português, S.A. informed about resolutions of the Annual General Meeting

Banco Comercial Português, S.A. concluded on 22 May 2025, at the Bank's facilities and, simultaneously, through electronic means with 66.19% of the share capital represented, the Annual General Meeting of Shareholders, with the following resolutions:

Item One – Approval of the management report, the balance sheet and the individual and consolidated accounts for the financial year 2024, the Corporate Governance Report, which includes a chapter on the remuneration of the management and supervisory bodies, and the Sustainability Report;

Item Two – Approval of the proposal for the appropriation of net income regarding the 2024 financial year;

Item Three – Approval of a vote of trust and praise addressed to the Board of Directors, including to the Executive Committee and to the Audit Committee and each one of their members, as well as to the Chartered Accountant and its representative;

Item Four – Ratification of the co-option of a director for the 2022-2025 term of office;

Item Five – Approval of the Shareholder Distribution Policy;

Item Six – Approval of the updating the Remuneration Policy for Members of the Management and Supervisory Bodies;

Item Seven – Approval of the updating the Internal Policy for the Selection and Assessment of the suitability of members of the management and supervisory bodies and key function holders;

Item Eight – Approval of the reduction of the Bank's share capital by up to Euros 150,000,000.00 (one hundred and fifty million euros), with the special purpose of implementing a Buyback Programme and cancelling own shares already acquired or to be acquired under said programme, involving the cancellation of up to 755,699,497 own shares representing up to 5% of the total number of shares representing the share capital, as well as the related reserves, with the consequent amendment of article 4(1) of the articles of association;

Item Nine – Approval of the increase of the Bank's share capital to Euros 3,000,000,000, by incorporating the special reserve that may be set up under item Eight of the Agenda, by the amount corresponding to the resulting share capital reduction and without issuing new shares, with the consequent amendment of Article 4(1) of the articles of association;

Item Ten – Approval of the amendment to article 27(2) of the Articles of Association (postal and electronic voting);

Item Eleven – Approval of the acquisition and sale of own shares and bonds.

Banco Comercial Português, S.A. informed about ratings upgrade by Moody's

On 21 May 2025, Banco Comercial Português, S.A. ("BCP" or "Bank") informed that Moody's has upgraded the Baseline Credit Assessment (BCA) and Adjusted BCA from 'baa3' to 'baa2'. This upgrade reflects the group's strengthened creditworthiness, in particular its significantly improved asset-risk metrics, its higher capital levels and the group's enhanced bottom-line profitability, that will, nevertheless, continue to be strained over the outlook period by the relatively high, albeit decreasing, legal provisions associated to BCP's Polish subsidiary's legacy Swiss franc mortgage portfolio. BCP's BCA also reflects the bank's sound funding and liquidity position.

As a result, Moody's upgraded the rating of the deposits from 'A3' to 'A2', the rating of the subordinated debt from 'Ba1' to 'Baa3', standing after the revision at an Investment Grade level and affirmed the rating of the senior unsecured debt at 'Baa1'.

The Outlook on the deposit rating was changed to stable, while the Outlook on senior unsecured debt is stable.

Banco Comercial Português, S.A. informed on the approval of a Share Buyback Programme

On 8 April 2025, the Bank informed that a share buyback programme in the total amount of EUR 200 million, equivalent to approximately 2,683%^[1] of BCP's market capitalisation^[1] was approved today. The objective of the Buy-Back Programme, for the purposes of Article 5(2)(a) of Regulation (EU) 596/2014, is the cancellation of treasury shares acquired under its scope and it will be implemented in accordance with the provisions of Regulation (EU) 596/2014, as supplemented by Delegated Regulation (EU) 2016/1052, taking into consideration the terms and conditions described, and also being conditional to: (i) the limits set out in the resolution adopted under item 6 of the Agenda of the General Meeting held on 22 May 2024, as duly disclosed to the market; (ii) the terms and conditions of any future authorisations for the acquisition of treasury shares that may be approved by the General Meeting of Shareholders of BCP; and (iii) the terms and conditions of any share capital reduction that may be resolved for these purposes by the General Meeting of Shareholders. On 14 April 2025, the Bank started trading own shares in the context of the Share Buy-Back Programme approved by the Bank in accordance with the terms and conditions described in the announcement regarding the start of trading under the Buy-Back Programme disclosed by BCP on 8 April 2025.

Banco Comercial Português, S.A. informed on the termination of rating assignment by Morningstar DBRS to BCP's Covered Bonds

Banco Comercial Português, S.A. ("BCP") hereby informed that, on 1 April 2025, and at its request, ceased the assignment of rating by Morningstar DBRS to the Covered Bonds issued by BCP.

BCP's covered bonds maintain the ratings currently assigned by Moody's and Fitch Ratings, respectively, of 'Aaa' and 'AAA'.

Banco Comercial Português, S.A. informed about the decision to launch a tender offer on a T2 Notes issue due December 2027

On 13 March 2025, Banco Comercial Português, S.A. ("BCP") informed it has decided to launch a tender offer (the "Offer") in respect to its outstanding EUR300,000,000 4.50% T2 Subordinated Fixed Rate Reset Notes due December 2027 (ISIN: PTBCPWOM0034) (the "Notes").

The Offer is conditional on the successful completion of the issuance of a new series of Subordinated Fixed Rate Reset Notes to be issued off the Banks' Euro Note Programme, subject to market conditions in amount of at least EUR 450,000,000 (the "New Notes").

When considering allocation of the New Notes, BCP may give preference to those noteholders that, prior to such allocation, have validly tendered (or have given a firm intention to tender) their Notes for purchase pursuant to the Offer.

The purpose of the Offer is to proactively manage BCP's capital structure and debt profile. The Offer also provides liquidity for investors in the Notes simultaneously with the opportunity to apply for priority allocation in the new Tier 2 issuance.

Banco Comercial Português, S.A. informed about issue of Tier 2 Notes

On 13 March 2025, Banco Comercial Português, S.A. hereby informed, that on the same day, Bank has fixed the terms for a new issue of subordinated Tier 2 Notes under its Euro Note Programme.

The issue, in the amount of EUR 500 million, will have a tenor of 12 years, with the option of early redemption by the Bank in the last three months of year 7, an annual interest rate of 4.75% during the first 7 years (corresponding to a spread of 2.150% (the "Spread") over the 7-year mid-swap rate). The interest rate for the last 5 years will be determined on the basis of the then applicable 5-year mid-swap rate plus the Spread.

^[1] With reference to the closing price registered in the regulated market Euronext Lisbon on 8 April 2025.

Banco Comercial Português, S.A. informed about decision to early redeem in full the EUR 450,000,000 Subordinated Fixed Rate Reset Notes due 27 March 2030 bond issue

On 10 March 2025, Banco Comercial Português, S.A. informed that it has decided to exercise its option to early redeem all of its EUR450,000,000 Subordinated Fixed Rate Reset Notes due 27 March 2030 (ISIN: PTBIT3OM0098), issued on 27 September 2019 under the EUR 25,000,000,000 Euro Note Programme (the “Notes”), in accordance with condition 6(d) of the terms and conditions of the Notes and the final terms of the Notes. The early redemption of the Notes shall take place on the optional redemption date set out in the final terms of the Notes, 27 March 2025, at their outstanding principal amount together with accrued interest.

Downgrade of the rating attributed by S&P – Standard & Poor’s to Mozambique’s sovereign debt

On 19 February 2025, S&P further downgraded its long-term government debt rating by 1 notch from CCC to CCC-, due to liquidity challenges and apparent delays in payments to domestic creditors.

On 21 March 2025, S&P downgraded the rating of Mozambique's long-term local currency sovereign debt again from CCC- to SD (Selective Default).

On 10 October 2025, S&P maintained the aforementioned ratings. This assessment by S&P Global Ratings reinforces the need for close monitoring of the evolution of Mozambique's sovereign risk.

Banco Comercial Português, S.A. informed on the co-optation of non-executive independent Director

On 22 January 2025, Banco Comercial Português, S.A. informed that its Board of Directors, in accordance with the law and the Bank's regulations on Succession Planning, today approved the co-optation of Esmeralda da Silva Santos Dourado as independent non-executive director of the Bank, thus filling the vacancy on the Board of Directors for the four-year period 2022-2025.

The co-optation was resolved following obtaining authorisation from the European Central Bank to exercise her functions and will be submitted for ratification at the Bank's next General Meeting

49. Consolidated Balance sheet and Income statement by segments

The segments presented are in accordance with IFRS 8. In accordance with the Group's management model, the segments presented correspond to the segments used for management purposes by the Executive Committee. The Group offers a wide range of banking activities and financial services in Portugal and abroad, with a special focus on Commercial Banking, Companies Banking and Private Banking.

Segments description

The Group operates in the Portuguese market and also in a few affinity markets with recognized growth potential. Considering this, the geographical segments are structured in Portugal and International Business (Poland, Mozambique and Other). Portugal segment reflects, essentially, the activities carried out by Banco Comercial Português in Portugal and ActivoBank.

Portugal activity includes the following segments: i) Retail Banking; ii) Companies and Corporate; iii) Private Banking and iv) Other.

Retail Banking includes the following business areas:

- Retail network, which ensures the monitoring of individual customers, entrepreneurs, merchants and small and medium enterprises with a turnover less than EUR 2.5 million. The Retail network strategic approach is to target "Mass Market" customers, who appreciate a value proposal based on innovation and speed, as well as Prestige and Small Business customers, whose specific characteristics, financial assets or income imply a value proposal based on innovation and personalization, requiring a dedicated Account Manager;
- Retail Recovery Division that manages customers or economic groups in effective default, as well as customers who have filed for bankruptcy or other similar mechanisms, aiming to minimize losses through agreements or payment restructuring processes; and
- ActivoBank, a bank focused on mainly young customers, who are intensive users of new communication technologies and who prefer a banking relationship based on simplicity, offering modern products and services.

Companies and Corporate segment includes:

- Companies and Corporate network, which monitors customers included in the corporate segment, economic groups and institutional entities, with a turnover higher than EUR 2.5 million, offering a wide range of traditional banking products complemented by specialized financing;
- Large Corporate network that assures the relationship and the monitoring of a set of Groups / Customers, which in addition to Portugal, develop their activity in several geographies (Poland, Angola, Mozambique and East), providing a complete range of value-added products and services;
- Specialized Recovery Division which ensures efficient tracking of customers with predictable or effective high risk of credit, from Companies, Corporate, Large Corporate and retail networks (exposure exceeding EUR 1 million), in order to defend the value and manage credit risk;
- Investment Banking unit, that ensures the offer of products and specific services, in particular financial advice, including corporate finance services, capital market transactions and analysis and financing structuring in the medium to long-term;
- Interfundos with the activity of management of real estate investment funds;
- Specialized Credit and Real Estate Department, with the mission of managing the Group's foreclosed assets portfolio, referred as non-performing assets, in order to place them back to the market;

- Treasury, Markets and International Department, which coordinates business with banks and financial institutions in order to better serve the Group's commercial networks and operations abroad. This unit has a dynamic emphasis that promotes international business within commercial networks, aiming to be a partner for customers for internationalization. It also provides securities custody services to resident and non-resident customers, and grants the Group's intervention in the financial markets, providing commercial services for treasury and markets products and managing the financial risks inherent to the Group's activity.

The Private Banking segment comprises:

- Private Banking Division in Portugal, focused on high net worth individuals, based on a commitment to excellence and a personalized relationship with customers;
- Wealth Management Division, which provides advisory customer services and portfolio management for customers in the Private Banking network and the affluent segment.

All other businesses not previously discriminated are allocated to the Other segment (Portugal) and include centralised management of financial investments, corporate activities and operations not integrated in the remaining business segments and other amounts not allocated to segments.

International Business includes the following segments:

- Poland, where the Group is represented by Bank Millennium, a universal bank offering a wide range of financial products and services to individuals and companies nationwide. Polish activity is segmented as follow:
 - Retail Banking, which includes services aimed at mass-market customers, affluent customers and individual entrepreneurs, through a comprehensive offer of banking products and services, as well as the distribution of specialised products provided by the Group's subsidiaries;
 - Companies and Corporate, focused on serving companies of all sizes, including public sector entities, with a high-quality suite of tailored banking solutions, complemented by cash management services, treasury products (including derivatives), and leasing and factoring offerings; and
 - Other covering the Group's activities such as treasury management, brokerage operations, positions in debt securities and other items not allocated to specific segments, as well as the impacts of FX mortgage portfolio;
- Mozambique, where the Group is represented by BIM – Banco Internacional de Moçambique, a universal bank targeting companies and individual customers; and
- Other, which includes the contribution of the associate in Angola.

Business segments activity

The figures reported for each segment resulted from aggregating the subsidiaries and business units integrated in each segment. For the business units in Portugal, the aggregation process reflects the impact from capital allocation and balancing process in the balance sheet and income statement, based on average figures. The balance sheet headings for each business unit in Portugal were calculated considering the allocation process, based on the regulatory solvency criteria.

Considering that the process of capital allocation complies with the regulatory criteria of solvency in force, from 1 January 2025, the risk weighted assets, and consequently the capital allocated to the business segments, are determined in accordance with the Basel IV framework, pursuant to the CRD VI/CRR3 (in 2024, they are determined in accordance with the Basel III framework, pursuant to the CRD V/CRR2). The capital allocated to each segment resulted from the application of a target capital ratio to the risk weighted exposures managed by each segment, reflecting the application of the Basel IV methodology in 2025 (Basel III in 2024). The introduction of CRR3 led to a significant increase in risk weighted assets to cover operational risk. Each operation is balanced through internal transfers of funds, with impact on the net interest income and income taxes of each segment, hence with no impact on consolidated accounts.

Commissions and other net income, as well as operating costs calculated for each business area, are based on the amounts accounted for directly in the respective cost centres, on the one hand, and the amounts resulting from internal processes for allocating revenues and costs, for another. In this case, the allocation is based on the application of pre-defined criteria and subject to periodic review, related to the level of activity of each business area.

The following information has been prepared based on the individual and consolidated financial statements of the Group prepared in accordance with international financial reporting standards (IFRS), as adopted by the European Union (EU), at the reference date and with the Organization of the Group's business areas in force on 30 September 2025. Information relating to prior periods is restated whenever changes occur in the internal organisation of the Group that affect the composition of the reportable segments or relevant changes in the criteria for allocation of indirect revenues and costs, as described in the previous paragraph, ensuring the comparability of the information provided across the reported periods.

The information in the financial statements of reportable segments is reconciled, at the level of the total revenue for those segments, with the revenue presented in the consolidated financial position statement of the reporting entity for each reporting date on which is lodged a statement of financial position. Whenever applicable, historical figures may reflect specific restatements carried out to ensure the comparability of information across periods.

As at 30 September 2025, the net contribution of the main geographical areas, for the income statement, is analysed as follows:

	(Thousands of euros)				
	30 September 2025				
		International			
	Portugal	Poland	Mozambique	Others (*)	Consolidated
INCOME STATEMENT					
Net interest income	994,750	1,012,637	159,215	—	2,166,602
Net fees and commissions income	465,482	135,820	27,479	—	628,781
Other net income	(9,577)	(87,955)	935	—	(96,597)
Gains/(losses) on financial operations ⁽¹⁾	10,800	58,487	11,372	—	80,659
Dividends from equity instruments	—	803	—	—	803
Share of profit of associates under the equity method	40,179	—	1,153	3,290	44,622
Net operating income	1,501,634	1,119,792	200,154	3,290	2,824,870
Operating expenses	517,913	411,371	103,232	—	1,032,516
Results on modification ⁽²⁾	—	(5,394)	—	—	(5,394)
Impairment for credit and financial assets ⁽³⁾	(105,196)	(30,670)	(23,610)	—	(159,476)
Other impairment and provisions ⁽⁴⁾	(8,953)	(387,871)	(28,950)	—	(425,774)
Net income before income tax	869,572	284,486	44,362	3,290	1,201,710
Income tax	(215,693)	(82,461)	(18,939)	—	(317,093)
Net income for the period	653,879	202,025	25,423	3,290	884,617
Non-controlling interests	578	(100,810)	(8,470)	—	(108,702)
Net income for the period attributable to Bank's Shareholders	654,457	101,215	16,953	3,290	775,915

(*) Includes the contribution associated with the investments held in Angola, in Banco Millennium Atlântico.

(1) Includes results from financial operations at fair value through profit or loss, results from foreign exchange, results from hedge accounting operations and results arising from derecognition of financial assets and liabilities not measured at fair value through profit or loss.

(2) Includes the results of contractual amendments, namely, costs arising from negotiations with customers holding mortgages in foreign currency.

(3) Includes impairment of financial assets at amortised cost, for loans to customers (net of recoveries - principal and accrual) and for debt instruments related to credit operations. It also includes impairment of financial assets at amortised cost not associated with credit operations.

(4) Includes impairment of non-current assets held for sale, investments in associated companies, goodwill, other assets and provisions, highlighting the provisions for legal proceedings related to mortgage loans granted in Swiss francs, booked by the Polish subsidiary.

The detail of the net contribution of Portugal activity and Poland activity, by business areas, for the income statement, is analysed in the following table. Net contribution of Mozambique activity, which mostly comprises retail banking, is presented henceforth in this note only in an aggregated perspective (as presented in the previous table), given its relative weight in the consolidated activity of the Group.

(Thousands of euros)

	30 September 2025								
	Portugal				Total Portugal	Poland			Total Poland
	Retail banking	Companies and Corporate	Private banking	Others		Retail banking	Companies and Corporate	Others	
INCOME STATEMENT									
Net interest income	812,697	196,868	30,285	(45,100)	994,750	831,464	145,779	35,394	1,012,637
Net fees and commissions income	377,374	106,989	31,398	(50,279)	465,482	98,703	35,756	1,361	135,820
Other net income	7,830	7,803	(157)	(25,053)	(9,577)	8,641	1,505	(98,101)	(87,955)
Gains/(losses) on financial operations ⁽¹⁾	453	1,373	55	8,919	10,800	16,992	19,152	22,343	58,487
Dividends from equity instruments	—	—	—	—	—	—	—	803	803
Share of profit of associates under the equity method	—	—	—	40,179	40,179	—	—	—	—
Net operating income	1,198,354	313,033	61,581	(71,334)	1,501,634	955,800	202,192	(38,200)	1,119,792
Operating expenses	243,631	52,091	11,797	210,394	517,913	316,173	69,676	25,522	411,371
Results on modification ⁽²⁾	—	—	—	—	—	(3)	(644)	(4,747)	(5,394)
Impairment for credit and financial assets ⁽³⁾	(59,896)	(35,571)	(230)	(9,499)	(105,196)	(21,173)	(22,272)	12,775	(30,670)
Other impairment and provisions ⁽⁴⁾	—	—	—	(8,953)	(8,953)	—	—	(387,871)	(387,871)
Net income before income tax	894,827	225,371	49,554	(300,180)	869,572	618,451	109,600	(443,565)	284,486
Income tax	(271,132)	(68,287)	(15,015)	138,741	(215,693)	(117,505)	(20,824)	55,868	(82,461)
Net income for the period	623,695	157,084	34,539	(161,439)	653,879	500,946	88,776	(387,697)	202,025
Non-controlling interests	—	—	—	578	578	—	—	(100,810)	(100,810)
Net income for the period attributable to Bank's Shareholders	623,695	157,084	34,539	(160,861)	654,457	500,946	88,776	(488,507)	101,215

(1) Includes results from financial operations at fair value through profit or loss, results from foreign exchange, results from hedge accounting operations and results arising from derecognition of financial assets and liabilities not measured at fair value through profit or loss.

(2) Includes the results of contractual amendments, namely, costs arising from negotiations with customers holding mortgage loans in foreign currency.

(3) Includes impairment of financial assets at amortised cost, for loans to customers (net of recoveries - principal and accrual) and for debt instruments related to credit operations. It also includes impairment of financial assets at amortised cost not associated with credit operations.

(4) Includes impairment of non current assets held for sale, investments in associated companies, goodwill, other assets and provisions, highlighting the provisions for legal proceedings related to mortgage loans granted in Swiss francs, booked by the Polish subsidiary.

As at 30 September 2025, the net contribution of the main geographical areas, for the balance sheet, is analysed as follows:

	(Thousands of euros)				
	30 September 2025				
		International			
	Portugal	Poland	Mozambique	Others (*)	Consolidated
BALANCE SHEET					
Cash and Loans and advances to credit institutions	2,679,453	1,276,624	1,340,311	—	5,296,388
Loans and advances to customers ⁽¹⁾	41,812,113	17,670,426	626,415	—	60,108,954
Financial assets ⁽²⁾	21,648,048	16,040,348	583,255	(89)	38,271,562
Other assets	4,121,427	887,159	206,419	45,098	5,260,103
Total Assets	70,261,041	35,874,557	2,756,400	45,009	108,937,007
Deposits from other credit institutions ⁽³⁾	1,352,482	78,471	4,293	—	1,435,246
Deposits from customers ⁽⁴⁾	56,116,913	30,068,564	2,169,575	—	88,355,052
Debt securities issued ⁽⁵⁾	4,089,450	1,586,673	—	—	5,676,123
Other financial liabilities ⁽⁶⁾	1,102,925	606,658	99	—	1,709,682
Other liabilities ⁽⁷⁾	1,501,471	1,468,105	89,645	—	3,059,221
Total Liabilities	64,163,241	33,808,471	2,263,612	—	100,235,324
Total Equity	6,097,800	2,066,086	492,788	45,009	8,701,683
Total Liabilities and Equity	70,261,041	35,874,557	2,756,400	45,009	108,937,007
Number of employees	6,224	6,943	2,688	0	15,855

(*) Includes the contribution associated with the investments held in Angola, in Banco Millennium Atlântico.

(1) Includes loans and advances to customers at amortised cost net of impairment, debt instruments at amortised cost associated to credit operations net of impairment and balance sheet amount of loans to customers at fair value through profit or loss.

(2) Includes debt instruments at amortised cost not associated with credit operations (net of impairment), financial assets at fair value through profit or loss (excluding the ones related to loans to customers), financial assets at fair value through other comprehensive income and hedging derivatives.

(3) Includes deposits and other financing from central banks and deposits from other credit institutions.

(4) Corresponds to deposits and other funds from customers (including deposits from customers at amortised cost and customer deposits at fair value through profit or loss).

(5) Includes non-subordinated debt securities at amortised cost and financial liabilities at fair value through profit or loss (debt securities and certificates).

(6) Includes financial liabilities held for trading, subordinated debt and hedging derivatives.

(7) Includes provisions, current and deferred tax liabilities and other liabilities.

The detail of the net contribution of Portugal activity and Poland activity, by business areas, for the balance sheet, is analysed as follows:

(Thousands of euros)

	30 September 2025								
	Portugal				Total Portugal	Poland			Total Poland
	Retail banking	Companies and Corporate	Private banking	Other		Retail banking	Companies and Corporate	Other	
BALANCE SHEET									
Cash and Loans and advances to credit institutions	15,202,662	1,118,061	2,658,477	(16,299,747)	2,679,453	9,616,887	4,945,209	(13,285,472)	1,276,624
Loans and advances to customers ⁽¹⁾	29,036,237	11,659,986	394,373	721,517	41,812,113	13,788,677	3,569,988	311,761	17,670,426
Financial assets ⁽²⁾	—	—	—	21,648,048	21,648,048	—	—	16,040,348	16,040,348
Other assets	—	—	—	4,121,427	4,121,427	—	—	887,159	887,159
Total Assets	44,238,899	12,778,047	3,052,850	10,191,245	70,261,041	23,405,564	8,515,197	3,953,796	35,874,557
Deposits from other credit institutions ⁽³⁾	231,262	2,171,973	—	(1,050,753)	1,352,482	—	—	78,471	78,471
Deposits from customers ⁽⁴⁾	41,878,041	9,269,153	2,661,666	2,308,053	56,116,913	21,934,290	8,134,274	—	30,068,564
Debt securities issued ⁽⁵⁾	1,101,396	2,098	364,532	2,621,424	4,089,450	—	—	1,586,673	1,586,673
Other financial liabilities ⁽⁶⁾	—	—	—	1,102,925	1,102,925	—	—	606,658	606,658
Other liabilities ⁽⁷⁾	—	—	—	1,501,471	1,501,471	—	—	1,468,105	1,468,105
Total Liabilities	43,210,699	11,443,224	3,026,198	6,483,120	64,163,241	21,934,290	8,134,274	3,739,907	33,808,471
Total Equity	1,028,199	1,334,823	26,652	3,708,126	6,097,800	1,471,274	380,923	213,889	2,066,086
Total Liabilities and Equity	44,238,898	12,778,047	3,052,850	10,191,246	70,261,041	23,405,564	8,515,197	3,953,796	35,874,557
Number of employees	3,372	315	99	2,438	6,224	5,616	1,045	282	6,943

(1) Includes loans to customers at amortised cost net of impairment, debt instruments at amortised cost associated to credit operations net of impairment and balance sheet amount of loans to customers at fair value through profit or loss.

(2) Includes debt instruments at amortised cost not associated with credit operations (net of impairment), financial assets at fair value through profit or loss (excluding the ones related to loans to customers), financial assets at fair value through other comprehensive income and hedging derivatives.

(3) Includes deposits and other financing from central banks and deposits from other credit institutions.

(4) Corresponds to deposits and other funds from customers (including deposits from customers at amortised cost and customer deposits at fair value through profit or loss).

(5) Includes non-subordinated debt securities at amortised cost and financial liabilities at fair value through profit or loss (debt securities and certificates).

(6) Includes financial liabilities held for trading, subordinated debt and hedging derivatives.

(7) Includes provisions, current and deferred tax liabilities and other liabilities.

As at 30 September 2024 , the net contribution of the main geographical areas, for the income statement, is analysed as follows:

(Thousands of euros)					
30 September 2024					
	Portugal	International			Consolidated
		Poland	Mozambique	Others (*)	
INCOME STATEMENT					
Net interest income	1,003,448	955,883	151,432	—	2,110,763
Net fees and commissions income	437,738	136,805	30,107	—	604,650
Other net income	(27,666)	(71,847)	1,557	—	(97,956)
Gains/(losses) on financial operations ⁽¹⁾	28,378	(10,834)	11,707	—	29,251
Dividends from equity instruments	—	822	—	—	822
Share of profit of associates under the equity method	40,347	—	1,418	2,019	43,784
Net operating income	1,482,245	1,010,829	196,221	2,019	2,691,314
Operating expenses	482,265	365,619	97,828	—	945,712
Results on modification ⁽²⁾	—	(62,440)	—	—	(62,440)
Impairment for credit and financial assets ⁽³⁾	(102,903)	(66,536)	(994)	—	(170,433)
Other impairment and provisions ⁽⁴⁾	(60,674)	(385,241)	(11,022)	—	(456,937)
Net income before income tax	836,403	130,993	86,377	2,019	1,055,792
Income tax	(235,755)	(3,962)	(23,090)	—	(262,807)
Net income for the period	600,648	127,031	63,609	2,019	793,307
Non-controlling interests	5,369	(63,388)	(21,191)	—	(79,210)
Net income for the period attributable to Bank's Shareholders	606,017	63,643	42,418	2,019	714,097

(*) Includes the contribution associated with the investments held in Angola, in Banco Millennium Atlântico.

(1) Includes results from financial operations at fair value through profit or loss, results from foreign exchange, results from hedge accounting operations and results arising from derecognition of financial assets and liabilities not measured at fair value through profit or loss.

(2) Results mainly from the amount associated to costs arising from the moratorium program in Poland (credit holidays). It's also includes the results of contractual amendments, namely, costs arising from negotiations with customers holding mortgage loans in foreign currency.

(3) Includes impairment of financial assets at amortised cost, for loans to customers (net of recoveries - principal and accrual) and for debt instruments related to credit operations. It also includes impairment of financial assets at amortised cost not associated with credit operations.

(4) Includes impairment of non current assets held for sale, investments in associated companies, goodwill, other assets and provisions, highlighting the provisions for legal proceedings related to mortgage loans granted in Swiss francs, booked by the Polish subsidiary.

The detail of the net contribution of Portugal activity and Poland activity, by business areas, for the income statement, is analysed as follows:

(Thousands of euros)

	30 September 2024								
	Portugal					Poland			
	Retail banking	Companies and Corporate	Private banking	Other	Total Portugal	Retail banking	Companies and Corporate	Other	Total Poland
INCOME STATEMENT									
Net interest income	870,618	207,101	36,514	(110,785)	1,003,448	842,484	131,872	(18,473)	955,883
Net fees and commissions income	345,648	109,410	26,325	(43,645)	437,738	104,917	29,960	1,928	136,805
Other net income	10,287	8,554	77	(46,584)	(27,666)	(1,898)	656	(70,605)	(71,847)
Gains/(losses) on financial operations ⁽¹⁾	1,301	1,402	27	25,648	28,378	22,664	14,943	(48,441)	(10,834)
Dividends from equity instruments	—	—	—	—	—	—	—	822	822
Share of profit of associates under the equity method	—	—	—	40,347	40,347	—	—	—	—
Net operating income	1,227,854	326,467	62,943	(135,019)	1,482,245	968,167	177,431	(134,769)	1,010,829
Operating expenses	243,547	46,156	11,617	180,945	482,265	284,028	55,165	26,426	365,619
Results on modification ⁽²⁾	—	—	—	—	—	(42,492)	(464)	(19,484)	(62,440)
Impairment for credit and financial assets ⁽³⁾	(38,998)	(104,741)	(232)	41,068	(102,903)	(47,014)	(23,048)	3,526	(66,536)
Other impairment and provisions ⁽⁴⁾	—	—	—	(60,674)	(60,674)	—	—	(385,241)	(385,241)
Net income before income tax	945,309	175,570	51,094	(335,570)	836,403	594,633	98,754	(562,394)	130,993
Income tax	(295,881)	(54,953)	(15,993)	131,072	(235,755)	(112,980)	(18,763)	127,781	(3,962)
Net income for the period	649,428	120,617	35,101	(204,498)	600,648	481,653	79,991	(434,613)	127,031
Non-controlling interests	—	—	—	5,369	5,369	—	—	(63,388)	(63,388)
Net income for the period attributable to Bank's Shareholders	649,428	120,617	35,101	(199,129)	606,017	481,653	79,991	(498,001)	63,643

(1) Includes results from financial operations at fair value through profit or loss, results from foreign exchange, results from hedge accounting operations and results arising from derecognition of financial assets and liabilities not measured at fair value through profit or loss.

(2) Results mainly from the amount associated to costs arising from the moratorium program in Poland (credit holidays). It's also includes the results of contractual amendments, namely, costs arising from negotiations with customers holding mortgage loans in foreign currency.

(3) Includes impairment of financial assets at amortised cost, for loans to customers (net of recoveries - principal and accrual) and for debt instruments related to credit operations. It also includes impairment of financial assets at amortised cost not associated with credit operations.

(4) Includes impairment of non current assets held for sale, investments in associated companies, goodwill, other assets and provisions, highlighting the provisions for legal proceedings related to mortgage loans granted in Swiss francs, booked by the Polish subsidiary.

As at 31 December 2024, the net contribution of the main geographical areas, for the balance sheet, is analysed as follows:

	(Thousands of euros)				
	31 December 2024				
		International			
	Portugal	Poland	Mozambique	Others (*)	Consolidated
BALANCE SHEET					
Cash and Loans and advances to credit institutions	3,756,273	1,359,173	1,522,276	—	6,637,722
Loans and advances to customers ⁽¹⁾	38,633,527	17,531,311	684,977	—	56,849,815
Financial assets ⁽²⁾	20,055,990	12,822,561	644,740	(55)	33,523,236
Other assets	3,999,132	861,313	225,072	47,312	5,132,829
Total Assets	66,444,922	32,574,358	3,077,065	47,257	102,143,602
Deposits from other credit institutions ⁽³⁾	584,936	120,296	72,487	—	777,719
Deposits from customers ⁽⁴⁾	54,246,569	27,416,885	2,378,084	—	84,041,538
Debt securities issued ⁽⁵⁾	3,388,590	1,432,126	—	—	4,820,716
Other financial liabilities ⁽⁶⁾	1,120,748	525,187	92	—	1,646,027
Other liabilities ⁽⁷⁾	1,313,526	1,262,661	88,858	—	2,665,045
Total Liabilities	60,654,369	30,757,155	2,539,521	—	93,951,045
Total Equity	5,790,553	1,817,203	537,544	47,257	8,192,557
Total Liabilities and Equity	66,444,922	32,574,358	3,077,065	47,257	102,143,602
Number of employees	6,203	6,836	2,625	0	15,664

(*) Includes the contribution associated with the investments held in Angola, in Banco Millennium Atlântico.

(1) Includes loans to customers at amortised cost net of impairment, debt instruments at amortised cost associated to credit operations net of impairment and balance sheet amount of loans to customers at fair value through profit or loss.

(2) Includes debt instruments at amortised cost not associated with credit operations (net of impairment), financial assets at fair value through profit or loss (excluding the ones related to loans to customers), financial assets at fair value through other comprehensive income (net of impairment) and hedging derivatives.

(3) Includes deposits and other financing from central banks and deposits from other credit institutions.

(4) Corresponds to deposits and other funds from customers (including deposits from customers at amortised cost and customer deposits at fair value through profit or loss).

(5) Includes non-subordinated debt securities at amortised cost and financial liabilities at fair value through profit or loss (debt securities and certificates).

(6) Includes financial liabilities held for trading, subordinated debt and hedging derivatives.

(7) Includes provisions, current and deferred tax liabilities and other liabilities.

The detail of the net contribution of Portugal activity and Poland activity, by business areas, for the balance sheet, is analysed as follows:

(Thousands of euros)

	31 December 2024								
	Portugal					Poland			
	Retail banking	Companies and Corporate	Private banking	Other	Total Portugal	Retail banking	Companies and Corporate	Other	Total Poland
BALANCE SHEET									
Cash and Loans and advances to credit institutions	14,785,634	1,387,684	2,567,307	(14,984,352)	3,756,273	9,536,064	2,598,098	(10,774,989)	1,359,173
Loans and advances to customers ⁽¹⁾	26,700,789	11,290,811	362,472	279,455	38,633,527	13,826,512	3,398,737	306,062	17,531,311
Financial assets ⁽²⁾	—	—	—	20,055,990	20,055,990	—	—	12,822,561	12,822,561
Other assets	—	—	—	3,999,132	3,999,132	—	—	861,313	861,313
Total Assets	41,486,423	12,678,495	2,929,779	9,350,225	66,444,922	23,362,576	5,996,835	3,214,947	32,574,358
Deposits from other credit institutions ⁽³⁾	245,109	1,710,080	—	(1,370,253)	584,936	—	—	120,296	120,296
Deposits from customers ⁽⁴⁾	39,283,522	9,573,893	2,620,759	2,768,395	54,246,569	21,803,332	5,613,553	—	27,416,885
Debt securities issued ⁽⁵⁾	1,000,117	6,997	284,892	2,096,584	3,388,590	—	—	1,432,126	1,432,126
Other financial liabilities ⁽⁶⁾	—	—	—	1,120,748	1,120,748	—	—	525,187	525,187
Other liabilities ⁽⁷⁾	—	—	—	1,313,526	1,313,526	—	—	1,262,661	1,262,661
Total Liabilities	40,528,748	11,290,970	2,905,651	5,929,000	60,654,369	21,803,332	5,613,553	3,340,270	30,757,155
Total Equity	957,675	1,387,525	24,128	3,421,225	5,790,553	1,559,244	383,282	(125,323)	1,817,203
Total Liabilities and Equity	41,486,423	12,678,495	2,929,779	9,350,225	66,444,922	23,362,576	5,996,835	3,214,947	32,574,358
Number of employees	3,369	418	101	2,315	6,203	5,606	908	322	6,836

(1) Includes loans and advances to customers at amortised cost net of impairment, debt instruments at amortised cost associated to credit operations net of impairment and balance sheet amount of loans to customers at fair value through profit or loss.

(2) Includes debt instruments at amortised cost not associated with credit operations (net of impairment), financial assets at fair value through profit or loss (excluding the ones related to loans to customers), financial assets at fair value through other comprehensive income (net of impairment) and hedging derivatives.

(3) Includes deposits and other financing from central banks and deposits from other credit institutions.

(4) Corresponds to deposits and other funds from customers (including deposits from customers at amortised cost and customer deposits at fair value through profit or loss).

(5) Includes non-subordinated debt securities at amortised cost and financial liabilities at fair value through profit or loss (debt securities and certificates).

(6) Includes financial liabilities held for trading, subordinated debt and hedging derivatives.

(7) Includes provisions, current and deferred tax liabilities and other liabilities.

Reconciliation of net income of reportable segments with the net income attributable to shareholders

	(Thousands of euros)	
	30 September 2025	30 September 2024
Net contribution		
Retail banking in Portugal	623,694	649,428
Companies and Corporate	157,084	120,617
Private Banking	34,539	35,101
International business (continuing operations)	230,737	192,338
Non-controlling interests ⁽¹⁾	(109,280)	(84,580)
	936,774	912,904
Income arising from discontinued or discontinuing operations	—	322
	936,774	913,226
Amounts not allocated to segments (presented under Others)		
Net interest income - bonds portfolio	362,427	383,918
Net interest income - others ⁽²⁾	(407,529)	(494,704)
Foreign exchange activity	(35,901)	9,273
Gains / (losses) arising from sales of subsidiaries and other assets	20,540	15,385
Equity accounted earnings	40,179	40,347
Impairment and other provisions ⁽³⁾	(18,450)	(19,606)
Operational costs	(210,394)	(180,944)
Gains on sale of Portuguese public debt	(12,588)	1,751
Gains on sale of foreign public debt	7,347	2,104
Mandatory contributions	(20,386)	(40,133)
Loans sale	8,556	33,745
Income from other financial assets not held for trading mandatorily at fair value through profit or loss ⁽⁴⁾	(2,607)	1,909
Taxes ⁽⁵⁾	138,741	131,072
Non-controlling interests	578	5,369
Others ⁽⁶⁾	(31,372)	(88,615)
Total not allocated to segments (presented under Others)	(160,859)	(199,129)
Consolidated net income	775,915	714,097

(1) Corresponds mainly to the income attributable to third parties related to the subsidiaries in Poland and in Mozambique.

(2) Includes net interest income arising from internal transfer of liquidity, interest rate risk, cost of wholesale funding and others.

(3) Includes impairments for non-current assets held for sale, impairments for other assets, provisions for administrative infractions, various contingencies and other impairment and/or provisions not allocated to business segments.

(4) Includes gains/(losses) from corporate restructuring funds.

(5) Includes deferred tax revenue/(expenses), net of current non-segment tax expense, namely the tax effect associated with the impacts of the previous items.

(6) It includes other operations not allocated previously namely funding for non-interest-bearing assets and strategic financial investments.

50. Solvency

The Group's own funds are determined according to the established regulation, namely, according to Directive 2013/36/EU and Regulation (EU) 575/2013, approved by the European Parliament and the Council.

Total capital includes tier 1 and tier 2. Tier 1 comprises common equity tier 1 (CET1) and additional tier 1.

Common equity tier 1 includes: (i) paid-up capital, share premium, reserves and retained earnings deducted of any foreseeable charges or dividends and non-controlling interests; ii) and deductions related to own shares and loans to finance the acquisition of shares of the Bank, the shortfall of value adjustments and provisions to expected losses concerning risk-weighted exposure amounts calculated according to the IRB approach, goodwill and other intangible assets and the additional value adjustments necessary for the prudent valuation requirements applied to all assets at fair value, adjustments related to minimum commitment with collective investments undertakings, insufficient coverage for non-performing exposures and with the amount of securitisation positions, eligible for deduction as an alternative to a 1250 % risk weight. Reserves and retained earnings are adjusted by the reversal of unrealised gains and losses on cash-flow hedge transactions and on financial liabilities valued at fair value through profits and losses, to the extent related to own credit risk. The non-controlling interests are only eligible up to the amount of the Group's capital requirements attributable to the minorities. In addition, the deferred tax assets arising from unused tax losses carried forward are deducted, as well as the deferred tax assets arising from temporary differences relying on the future profitability and the interests held in financial institutions and insurers of at least 10%, in this case only in the amount that exceeds the thresholds of 10% and 15% of the common equity tier 1, when analysed on an individual and aggregated basis, respectively. The irrevocable payment commitments for the Single Resolution Fund, the fair value of the collateral for irrevocable commitments from the Deposits Guarantee Fund and the additional coverage for non-performing exposures, are also deducted, due to a SREP (Supervisory Review and Evaluation Process) recommendation.

Additional tier 1 comprises preference shares, hybrid instruments and perpetual bonds representing subordinated debt that are compliant with the issue conditions established in the Regulation, deducted from amounts related to loans granted to finance its acquisition and non-controlling interests related to minimum level 1 additional capital requirements of institutions that are not totally owned by the Group.

Tier 2 includes the subordinated debt that is compliant with the Regulation, deducted from amounts related to loans granted to finance its acquisition and the non-controlling interests related to minimum total capital requirements of institutions that are not totally owned by the Group. Additionally, Tier 2 instruments held in financial institutions and insurers of at least 10% are deducted.

According to the legislation in force, the capital requirements applicable to the Group, as at 30 September 2025, are as follows:

2025 Minimum Capital Requirements				
BCP Consolidated	Total	of which:		
		Pillar 1	Pillar 2	Buffers (*)
CET1	9.89%	4.50%	1.27%	4.13%
T1	11.82%	6.00%	1.69%	4.13%
Total	14.38%	8.00%	2.25%	4.13%

(*) Capital conservation buffer (CCB), other systemically important institution (O-SII), institution specific countercyclical capital buffer (CCyB) e de systemic risk buffer (SyRB).

The Group meets all the requirements and other recommendations issued by the supervisor on this matter.

The Group has adopted the methodologies based on internal rating models (IRB) for the calculation of capital requirements for credit and counterparty risk, covering a substantial part of both its retail portfolio in Portugal and Poland and its corporate portfolio in Portugal. The Group has adopted the advanced approach (internal model) for the coverage of trading portfolio's general market risk and for exchange rate risks generated in exposures in the perimeter centrally managed from Portugal, and the standard method was used for the purposes of operational risk coverage. The capital requirements of the other portfolios/geographies were calculated using the standardised approach.

The own funds and the capital requirements determined according to the CRD IV/CRR (phased-in) methodologies previously referred, are the following:

	(Thousands of euros)	
	30 September 2025	31 December 2024
Common equity tier 1 (CET1)		
Share capital	3,000,000	3,000,000
Share Premium	16,471	16,471
Ordinary own shares	(200,000)	—
Reserves and retained earnings	3,690,390	3,018,648
Non-controlling interests eligible to CET1	585,474	551,239
Regulatory adjustments to CET1	(371,779)	(23,119)
	6,720,556	6,563,239
Tier 1		
Equity instruments	400,000	400,000
Non-controlling interests eligible to AT1	93,915	93,372
Regulatory adjustments	(874)	—
	7,213,597	7,056,611
Tier 2		
Subordinated debt	987,534	992,236
Non-controlling interests eligible to Tier 2	197,025	219,321
Other	39,287	(2,483)
	1,223,846	1,209,074
Total own funds	8,437,443	8,265,685
RWA - Risk weighted assets		
Credit risk	33,871,758	33,909,206
Market risk	652,993	853,385
Operational risk	7,249,819	5,312,735
CVA	9,314	52,685
	41,783,884	40,128,011
Capital ratios		
CET1	16.1%	16.4%
Tier 1	17.3%	17.6%
Tier 2	2.9%	3.0%
Total own funds	20.2%	20.6%

The presented amounts include the accumulated net income.

51. Mozambique's sovereign debt

According to an International Monetary Fund (IMF) statement dated 23 April 2016, the State of Mozambique had guaranteed debt in an amount over USD 1 billion that had not been previously disclosed to the IMF. Following this disclosure, the economic programme supported by the IMF was suspended. According to an IMF statement dated 13 December 2016, discussions were initiated on a possible new agreement with the Government of Mozambique and the terms of reference for an external audit were agreed.

According to an International Monetary Fund (IMF) statement dated 23 April 2016, existing debt guaranteed by the State of Mozambique in an amount over USD 1 billion that had not been disclosed to the IMF. Following this disclosure, the economic program supported by the IMF was suspended. According to an IMF statement dated 13 December 2016, discussions were initiated on a possible new agreement with the Government of Mozambique and the terms of reference for an external audit were agreed.

In the statements dated of 16 January 2017 and 17 July 2017, the Ministry of Economy and Finance of Mozambique informed the holders of bonds issued by the Republic of Mozambique specifically "US\$726.524 million, 10.5%, repayable securities in 2023" that the interest payment due on 18 January 2017 and 18 July 2017, would not be paid by the Republic of Mozambique. In November 2018, the Ministry of Economy and Finance of the Republic of Mozambique announced that it has reached an agreement in principle on the key commercial terms of a proposed restructuring transaction related to this debt securities with four members of the Global Group of Mozambique Bondholders.

On 6 September 2019, the Ministry of Economy and Finance of the Republic of Mozambique announced the approval by 99.95% of the Bondholders of a written decision containing the terms and conditions of the restructuring proposal. The Group has no exposure to this debt.

In May 2020, the Constitutional Council of the Republic of Mozambique issued a Judgement, declaring the nullity of the acts related with the loans contracted by Proindicus, SA ("Proindicus") and Mozambique Asset Management, MAM, SA ("MAM"), and the respective sovereign guarantees granted by the Government in 2013 and 2014, respectively, and on 19 October 2020, the dissolution of the two companies was registered based on an order issued by the Judicial Court of the City of Maputo.

An action brought on 27 February 2019 (amended on 30 April 2020), by the Republic of Mozambique (represented by the Attorney General of the Republic) against the arranger and originating lender of the loan to Proindicus and other entities, by which the Republic of Mozambique requested, inter alia, the declaration of nullity of the sovereign guarantee of the Mozambican State to the Proindicus loan. Following this lawsuit, on 27 April 2020, the Banco Internacional de Moçambique (BIM) filed a lawsuit, in the London Commercial Court, against the arranger and lender of the loan to Proindicus, claiming, inter alia, payment of BIM's exposure to the Proindicus, in the event that the said sovereign guarantee of the State of Mozambique to Proindicus was, in a court of law declared null and void.

In the context of the liquidation of Proindicus and MAM, the Liquidator published, on 3 May 2022, an announcement in the Jornal de Notícias de Moçambique, through which the creditors of those companies are notified to submit, within thirty days counted from the said publication, the supporting documents of their credits. Following the publication of the said announcement, BIM and BCP submitted, on 1 June 2022, their credit claims on Proindicus and MAM, respectively.

However, on 30 September 2023, the Republic of Mozambique and the arranger and originating lender of the loan to Proindicus announced that they have settled amicably the legal proceedings in London concerning the loan to Proindicus and associated guarantee. This settlement was subscribed by the majority lenders of the said credit facility, including BIM. The signing parties to the agreement have mutually released each other from any liabilities and claims relating to the loan to Proindicus.

Regarding MAM, on 26 June 2024, the Republic of Mozambique, represented by the Attorney General of the Republic, MAM (in liquidation), represented by its Liquidator, BCP and others have signed a "Deed of Release and Settlement" (The "Agreement"), under which the signing parties released the Republic of Mozambique from any liabilities and claims relating to the loan to MAM, against payment of an agreed amount.

In 2024, and following the political and social situation in Mozambique as a result of the disputed presidential election results, Standard & Poor's ('S&P') downgraded Mozambique's sovereign debt rating (in local currency) in October 2024.

On 19 February 2025, S&P downgraded its long-term government debt rating by 1 notch from CCC to CCC-, due to liquidity challenges and apparent delays in payments to domestic creditors.

On 21 March 2025, S&P downgraded the rating of Mozambique's long-term local currency sovereign debt again from CCC- to SD (Selective Default).

Following this downgrade, BIM proceeded to classify the long-term government debt for stage 2, which contributed to the reinforcement of the impairment mentioned below.

On 10 October 2025, S&P maintained the aforementioned ratings. This assessment by S&P Global Ratings reinforces the need for close monitoring of the evolution of Mozambique's sovereign risk.

Considering the impairment model defined by Banco Internacional de Moçambique for sovereign debt, which applies the probability of default resulting from the S&P study, this situation implied an increase in the impairment levels for Mozambique's sovereign debt to MZN 3,784,280,000 (EUR 50,425,000) as at 30 September 2025 (31 December 2024: MZN 2,358,324,000 (EUR 35,771,000)). The impact on profit in the nine months period ended 30 September 2025 is MZN 1,222,022,000 (Euros 17,180,000), while the impact in the financial year of 2024 was MZN 2,372,954,000 (EUR 34,404,000).

Additionally, in order to strengthen impairment coverage, an overlay of approximately MZN 2,000 million was estimated. Of this amount, MZN 1,000 million (EUR 14.06 million) has already been constituted by 30 September 2025, and the remainder is expected to be constituted by December 2025.

The impact on the results for the nine-month period ended 30 September 2025 is MZN 2,222 million (EUR 31.24 million), which includes the aforementioned overlay.

As at 30 September 2025, the subsidiary BIM's exposure to the State of Mozambique includes public debt securities denominated in Metical classified as Financial assets measured at amortised cost - Debt instruments in the gross amount of MZN 40,533,311,000 corresponding to EUR 540,098,000 (31 December 2024: MZN 35,364,638,000 corresponding to EUR 536,405,000) and Financial assets at fair value through other comprehensive income in the gross amount of MZN 6,938,097,000 corresponding to EUR 92,449,000 (31 December 2024: MZN 9,396,711,000 corresponding to EUR 142,528,000).

Additionally, the Group has also recorded as at 30 September 2025, in the balance Loans and advances to customers, a direct gross exposure to the Mozambican State in the amount of MZN 17,625,991,000 corresponding to EUR 234,863,000 (31 December 2024: MZN 17,791,809,000 corresponding to EUR 269,863,000) and in the balance Guarantees granted revocable and irrevocable commitments, an amount of MZN 1,575,088,000 corresponding to EUR 20,981,000 (31 December 2024: MZN 2,943,963,000 corresponding to EUR 44,600,000).

As at 30 September 2025 considering the 66.7% indirect investment in BIM, the Group's interest in BIM's equity amounted to EUR 328,531,000 (31 December 2024: EUR 358,464,000), with the exchange translation reserve associated with this participation, accounted in Group's consolidated equity, in a negative amount of EUR 171,937,000 (31 December 2024: negative amount of EUR 128,243,000). BIM's contribution to consolidated net income, attributable to the shareholders of the Bank, was a positive amount of EUR 16,832,000 (30 September 2024: positive amount of EUR 42,418,000).

52. Contingent liabilities and other commitments

In accordance with accounting policy 1.U3, the main contingent liabilities and other commitments under IAS 37 are the following:

1. In 2012, the Competition Authority ("AdC") filed an administrative offence proceedings for alleged practices restricting competition (proceedings PRC 2012/9). On 6 March 2013, it carried out measures of search and seizure at Banco Comercial Português, S.A. ("BCP" or "Bank") and other credit institutions facilities, where it seized documents relevant to the investigation of an alleged exchange of sensitive commercial information between credit institutions in the national market.

The proceedings was subject to justice secrecy by decision of the AdC, considering that the interests of the investigation and the rights of the procedural parties would not be specifically compatible with the publicity of the proceedings. On 2 June 2015, the Bank was notified of an infringement notice ("NI") adopted by the AdC in the context of the investigation of proceedings PRC 2012/9, accusing it of participating, together with 14 other credit institutions, in an exchange of sensitive commercial information, regarding the offer of credit products in retail banking, namely home loan, consumer loan and corporate loan.

On 9 September 2019, the AdC adopted a final decision in this proceedings, and convicted the Bank to pay a EUR 60 million fine on the grounds that it had participated in a system of sharing confidential information between competitors regarding home loan, consumer loan and corporate loan. BCP disagrees with the Decision, which it considers having a set of serious defects, both in fact and in law, and appealed against it to the Competition Court on 21 October 2019, requesting that it be annulled and that the appeal be given suspensive effect. On 8 May 2020, the appeal was admitted. On 21 December 2020, BCP submitted, which the Competition Court accepted, a bank guarantee issued by the Bank itself as a way of fulfilling the bail. By order of 1 March 2021, the Competition Court granted suspensive effect to the judicial objection appeal as to the sentencing decision. By order of 20 March 2021, the Competition Court ordered the lifting of the justice secrecy and informed the appellants that the trial will, in principle, begin in September 2021.

On 28 April 2022, the CRSC ruled within proceedings Proc. n.º 225/15.4YUSTR-W, regarding the judicial objection appeal as to the decision of the Competition Authority of September 2019 (PRC/2012/09).

In this extensive ruling, the CRSC lists the facts given as proven, both in the administrative phase and in the trial, however, at this stage, the CRSC has not yet concluded that the facts have been proven are legally based, nor, consequently, that fines should be imposed, and the CRSC has instead chosen to make a reference for a preliminary ruling to the Court of Justice of the European Union (CJEU) to answer two questions referred for a preliminary ruling, requesting that this reference follow further terms in the form of an expedited procedure in view of the limitation risk. It should be noted that the CJEU is not responsible for judging the case, but only for interpreting the rules of Community law by answering in abstract to the questions referred to it by the national court.

The CJEU rejected the CRSC's request for an expedited procedure and for priority to be given in the examination of this proceedings.

On 29 July 2024, the CJEU delivered its judicial ruling in which it gave the following interpretation on the questions referred by the CRSC:

"Article 101(1), TFEU to be interpreted as meaning that a comprehensive reciprocal and monthly exchange of information between competing credit institutions, carried out on highly concentrated markets with high barriers to entry, and which regards the conditions applicable to transactions carried out on those markets, in particular spreads and risk variables, current and future ones, as well as the individualised production values of the participants in that exchange, to the extent that, at least, those spreads thus exchanged are those that those institutions intend to apply in the future, must be qualified as a restriction of competition by object."

After the judicial Ruling, the proceedings returned to the CRSC, which issued an order on 30 July 2024, notifying the Banks (i) of the appointment of 18 September 2024 for oral arguments, of an optional nature, limited to the content of the CJEU Ruling; and (ii) the designation of 20 September 2024 for the reading of the Ruling, in the part relating to the Law and the section.

On 20 September 2024, the CRSC issued its Final Ruling in which it deemed that an offence by object committed by the Appellants BPN/BIC, BBVA, BPI, BCP, BES, Popular/Santander, Santander, Barclays, Caixa Agrícola, Montepio, CGD and UCI, embodied in an exchange of sensitive information between competitors, was verified in the case files.

In its Ruling, the CRSC confirmed the EUR 60 million fine imposed by the AdC on the Bank.

On 14 October 2024, the Bank filed its appeal with the Lisbon Court of Appeal (TRL), which, by decision issued on 10 February 2025 by its Intellectual Property, Competition and Supervision Section, decided, by majority, to declare the pending administrative offence proceedings against the Defendant companies in relation to the practice of the aforementioned administrative offence to be barred and ordered the timely filing of the case.

In summary, the TRL considered that the facts occurred between 2002 and March 2013, applying the 2012 Competition Law, which provides for the maximum limitation period for administrative offence proceedings of 10 years and 6 months, and not applying the 2022 Competition Law, which provides for a longer period of suspension of the limitation period for administrative offence proceedings (either because the legislator so determined, or because it is more unfavourable than the 2012 Competition Law).

Moreover, the reference for a preliminary ruling (made by the TCRS to the CJEU) does not suspend (autonomously) the limitation period.

The TRL also considered that the limitation occurred on 1 September 2023 or, at the limit, applied to the so-called Covid-19 laws, on 11 February 2024.

The Public Prosecutor's Office appealed against this decision to the Lisbon Court of Appeal and the Competition Authority appealed to the Constitutional Court.

The Lisbon Court of Appeal rejected the Public Prosecutor's Office's claims of nullity regarding the statute of limitations.

The Competition Authority and the Public Prosecutor's Office then filed appeals to the Constitutional Court against the Lisbon Court of Appeal's ruling of February 10, 2025, which declared the statute of limitations for the administrative offence proceedings to be time-barred.

Both the Competition Authority and the Public Prosecutor's Office raised questions of unconstitutionality related to the exclusion of preliminary references to the CJEU as a ground for suspending the statute of limitations in administrative offence proceedings. While the Competition Authority focuses on the uniform application of European law and the effectiveness of the competition sanctions regime, pointing out violations of the principles of the Primacy of European Union Law and Effective Legal Protection, the Public Prosecutor's Office adopts a broader approach, also including violations of the Principle of Equality.

These appeals were admitted by the Regional Court of Appeal and were brought before the Constitutional Court.

The Constitutional Court admitted these appeals and issued a Summary Decision on 4 June 2025, disregarding the appeals filed by the Competition Authority and the Public Prosecutor's Office.

Following this Summary Decision, the Competition Authority filed an appeal against the Constitutional Court's individual decision to disregard the appeals filed by the Competition Authority and the Public Prosecutor's Office, which the Constitutional Court is currently awaiting.

The Constitutional Court's decision on the appeal is currently awaited.

On 25 August 2025, the Constitutional Court issued its judgment dismissing the complaint filed for review by this Court, confirming its Summary Decision of 4 June 2025, regarding the inadmissibility of the appeal.

In light of this Constitutional Court judgment, the Lisbon Court of Appeal's judgment of 10 February 2025 became final, making the decision declaring the statute of limitations for the administrative offence proceedings final. This concluded the proceedings and eliminated the payment of any fines by the Banks.

1-A. In relation to this administrative offence proceeding of the Competition Authority PRC/2012/09, and in view of the alleged damage caused by the targeted and defendant Banks to bank customers, resulting from the alleged sharing of confidential information between the Banks relating to home loan, consumer loan and corporate loan, three declaratory popular actions of conviction were filed against the Bank and several other banking institutions.

These proposed popular actions aim to compensate consumers and companies affected by alleged harm caused by the alleged anti-competitive practice. Actions vary depending on the group of consumers and companies represented and the damages calculated.

It should be noted that the decision issued by the Lisbon Court of Appeal on 10 February 2025, which decided to declare the administrative offence proceedings PRC/2012/09 barred, does not extinguish these popular actions, which will now fully continue as "stand alone", not taking advantage of the presumption of evidence produced in this case.

1-A.1. On 11 March 2024, BCP, along with 8 banking institutions, was summoned, to plead a "popular declaratory action of conviction in the form of a common proceeding aimed at the protection of competition, consumer rights, and diverse and/or collective interests associated with the consumption of goods and services", an action brought by Ius Omnibus Association, which is under no. 2/24.IYQSRT in the Competition, Regulation and Supervision Court, entirely based on the alleged competition offence in home and consumer loan transactions declared in the AdC's Ruling of 9 September 2019 (PRC/2012/09), a ruling that was subject to a judicial objection appeal by BCP, an objection that has not yet been definitively judged.

In this case, the Plaintiff makes the following main claims:

1. To be declared that, from May 2002 to March 2013, the Defendants violated, in a single and continuous practice, article 101(2) of the TFEU and (subsequently) article 2 of Decree-Law no. 371/393 and article 4 of Law no. 18/2003, by exchanging strategic, non-public, current and future information, with its competitors, in a disaggregated, individualised and regular manner, namely, on their respective offers of home loan and consumer loan;
2. To be declared that this Defendants' practice has caused damage to the diverse or collective protection interests of the consumption of goods and services and of competition, and to the individual homogeneous interests of the consumers represented;
3. Alternatively to section 2, to be declared that the Defendants' practice has led to their unjust enrichment at the expense of the impoverishment of all the consumers represented;
4. Based on civil liability, or, alternatively, by restitution of the undue, the Defendants be sentenced to compensate/return in full all the consumers represented in this lawsuit for the damage suffered/overprice paid as a result of the anti-competitive practices in question in the amount resulting from the sum of several factors.
5. To be declared the nullity of the clause(s) that fix the spread rate in home loan agreements and consumer loan agreements entered into by consumers represented during the relevant period, the aforementioned clause(s) being consequently reduced in the part corresponding to the unlawful overprice, in agreements whose validity exceeds the date of the final judgment, and in which the Defendants are lenders, because they were entered into by them or by subsequent termination of the contractual position.

As the deadline for the pleading is running, the Bank was notified on 9 May 2024 that an order had been issued ordering the suspension of the proceedings until the final judgment to be rendered in proceeding no. 225/15.4YUSTR-W (the judicial objection appeal of the administrative offence proceeding PRC/2012/09), before this Competition, Regulation and Supervision Court.

At the time, the TCRS also determined that, as soon as the administrative proceeding became final, the records of Case n°. 2/24.IYQSTR would be notified.

With the final judgment of the administrative proceeding having already become final on 11 September 2025, we are currently awaiting notification of the order lifting the suspension of Case No. 2/24.IYQSTR, after which the deadline for filing the Response will begin again.

1-A.2. On 8 April 2024, BCP, along with 9 banking institutions, was summoned to oppose another case brought by Ius Omnibus Association against the banks, under no. 6/24.4YQSTR, also related to the aforementioned Ruling of the AdC of 9 September 2019 (PRC/2012/09), this case being related to the corporate credit segment.

In this case, the Plaintiff makes the following main claims:

1. To be declared that from May 2002 to March 2013, the Defendants violated, in a single and continuous practice, article 101 of the TFEU and (successively) article 2 of Decree-Law No. 371/393 and article 4 of Law No. 18/2003, by exchanging strategic, non-public, current and future information with their competitors, in a disaggregated, individualised, and regular manner, namely, on their respective credit offers to companies;
2. To be declared that the Defendants' practice has caused damage to the diverse or collective protection interests of the consumption of goods and services and of competition, and to the individual homogeneous interests of the consumers represented;
3. Based on civil liability, or, alternatively, by restitution of the undue, the Defendants be sentenced to compensate/return in full all the consumers represented in this lawsuit for the damage suffered/overprice paid as a result of the anti-competitive practices in question, associated with the credits to the companies entered into between the Defendants and companies in Portugal, in the period from May 2005 to September 2012, with regard to the overprice that was passed on by the companies to the represented consumers, and charged directly by the Defendants, in a global amount to be fixed and determined considering several factors.

On 18 November 2024, the Bank filed its opposition with the Competition, Regulation and Supervision Court.

On 8 January 2025, the Court ordered the attachment of Case n° 10/24.2YQSRT, identified below, to this case.

On 8 July 2025, the TCRS issued an Order of Acquittal of the Instance regarding the claims filed by IUS Omnibus because the class of defendants was not adequately defined by Plaintiff Ius Omnibus.

Essentially, the TCRS found that the AIO failed to identify the small and medium-sized Portuguese companies that contracted corporate loans in Portugal during the period of the alleged infringement, as stated in the Initial Petition, nor is this publicly available. Indeed, it would be virtually impossible for the alleged defendants to identify these companies and, therefore, guarantee their future claim for individual compensation.

The TCRS ruling of 9 July 2025, has already become final and was not appealed by the AIO. Consequently, the Defendants (including BCP) were acquitted of the action brought by the AIO.

However, it is worth noting that, given that the action in Case No. 10/24.2YQSRT (the AMPEMEP action, which we will discuss in section 1-A.3. below) was joined to the action in Case No. 10/24.2YQSRT, the AIO's action is addressed separately in section 1-A.3.

1-A.3. On 24 April 2024, BCP, along with 9 banking institutions, was summoned to oppose an action brought by Association of Portuguese Micro, Small and Medium Enterprises (AMPEMEP) against the banks, under no. 10/24.2YQSRT, also related to the aforementioned AdC' Decision of 9 September 2019 (PRC/2012/09), this case also being related to the corporate credit segment.

In this case, the Plaintiff makes the following main claims:

1. To be declared that from May 2002 to March 2013, the Defendants violated, in a single and continuous practice, article 101 of the TFEU and (successively) article 2 of Decree-Law No. 371/393 and article 4 of Law No. 18/2003, by exchanging strategic, non-public, current and future information with their competitors, in a disaggregated, individualised, and regular manner, namely, on their respective credit offers to companies;
2. To be declared that this Defendants' practice has caused damage to the diverse or collective protection interests of the consumption of goods and services and of competition, and to the individual homogeneous interests of the consumers represented;
3. Based on civil liability, or, alternatively, by restitution of the undue, the Defendants be sentenced to compensate/return in full all the consumers represented in this lawsuit for the damage suffered/overprice paid as a result of the anti-competitive practices in question, associated with the credits to the companies entered into between the Defendants and companies in Portugal, in the period from May 2005 to September 2012, with regard to the overprice that was passed on by the companies to the represented consumers, and charged directly by the Defendants, in a global amount to be fixed and determined considering several factors.

On 17 December 2024, the Bank filed its opposition with the Competition, Regulation and Supervision Court.

In view of the similarity of the object and parts of these 3 popular actions, the possibility of joining them was raised, and BCP was notified, in the context of proceeding no. 6/24.4YQSTR (point 1-A.2.above) to rule on the joinder to this action of proceeding no. 10/24.2YQSTR (point 1-A.3.above).

The Bank has already ruled on this issue, requesting the opposite, that is, that proceeding no. 6/24.4YQSTR be joined to proceeding no. 10/24.2YQSTR instead, requesting that the logical precedence relationship between this proceeding and that one be declared, and that the Judge in charge of proceeding no. 10/24.2YQSTR be granted the decision to join proceeding no. 6/24.4YQSTR.

On 8 January 2025, the Court ordered this to be attached to Process No. 6/24.4YQSRT.

Following the Preliminary Hearing on 10 July 2025, by a Corrective Order, the TCRS (Court of Appeals) ruled that the Defendants, including BCP, be acquitted of the claims for compensation, considering that AMPEMEP lacks standing to bring them due to the insufficient definition of the represented class and the failure to demonstrate homogeneity among the allegedly represented companies.

However, the TCRS found that AMPEMEP has standing to request a declaration of wrongdoing in the corporate credit segment, which is why the lawsuit proceeds without the Defendants, including BCP, being ordered to pay compensation.

The Court also invited AMPEMEP to identify the articles of the Initial Petition that embody the violation (limited to information on corporate credit) and the respective evidence. AMPEMEP filed its request to this effect on 9 October 2025. Currently, the deadline for us to submit our evidence is 3 November 2025.

The case will proceed to assess the merits of the request for a declaration of a competition law violation.

2. On 7 June 2022, the Bank was notified by the Court to contest a lawsuit brought by Fundação José Berardo and José Manuel Rodrigues Berardo against Banco Comercial Português, S.A., Caixa Geral de Depósitos, S.A., Novo Banco, S.A. and Banco Espírito Santo, S.A., in liquidation.

In this lawsuit, the Plaintiffs allege that they incurred in a mistake regarding the endogenous situation of the defendant banks and the financial system, without which they would have sold the pledged shares and paid their loans. If this is not the case, the plaintiffs request the defendant banks to be ordered to pay compensation to Fundação José Berardo for damages caused by breach of contract, since the moment when they should have been sold in execution of the pledge due to failure to verify coverage ratios until the moment when they were sold, that is, the difference between the price at which the pledged shares would have been sold on the dates of coverage ratios default and the price at which they were actually sold, plus interest and all other loan charges since those dates, in any case the global amount of compensation not being less than EUR 800,000,000. In any case, the plaintiffs ask the defendant banks to be jointly condemned to pay José Manuel Rodrigues Berardo compensation for moral damages, in the already calculated amount of EUR 100,000,000 and also in the amount that is settled as soon as the full extent of the damages is known.

In the meantime, through Order No. 8765/2022 of Mr. Secretary of State for the Presidency of the Council of Ministers, published in Republic Diary, Series 2, part C, of 19 July 2022, the Plaintiff of this lawsuit, Fundação José Berardo, was declared extinct. This decision was legally contested by the José Berardo Foundation, and in April 2023, the Administrative and Fiscal Court of Funchal cancel the decision that ordered its extinction. Dissatisfied, the Portuguese State appealed against this latter and is awaiting the outcome.

The lawsuit was contested on 27 September 2022 and is awaiting subsequent terms.

Nothing relevant to the judgment on the merit of the case happened. The lawsuit is suspended until the motions submitted by FJB in the execution filed by the Banks (8489/19.8T8LSB) have been definitively judged.

On 24 October 2025, the action remains suspended.

The Bank does not anticipate that this lawsuit may result in any responsibility that could have impact on the respective financial statements.

3. On 3 January 2018, Bank Millennium received a decision of the Chairman of the Office for Protection of Competition and Consumers (OPCC Chairman), in which the OPCC Chairman found infringement by Bank Millennium of the rights of consumers. In the opinion of the OPCC Chairman the essence of the violation is that Bank Millennium informed consumers (it regards 78 agreements) in responses to their complaints, that the court verdict stating the abusiveness of the provisions of the loan agreement regarding exchange rates does not apply to them. According to the position of the OPCC Chairman the abusiveness of contract's clauses determined by the court in the course of abstract control is constitutive and effective for every contract from the beginning. As a result of the decision, Bank Millennium was obliged to:

- 1) send information on the UOKiK's decision to the said 78 clients;
- 2) place the information on decision and the decision itself on the website and on Twitter;
- 3) to pay a fine amounting to PLN 20.7 million (EUR 4.9 million).

Bank Millennium lodged an appeal within the statutory time limit.

On 7 January 2020, the first instance court dismissed Bank Millennium's appeal in its entirety. Bank Millennium appealed against the judgment within the statutory deadline. The court presented the view that the judgment issued in the course of the control of a contractual template (in the course of an abstract control), recognizing the provisions of the template as abusive, determines the abusiveness of similar provisions in previously concluded contracts. Therefore, the information provided to consumers was incorrect and misleading. As regards the penalty imposed by OPCC, the court pointed out that the policy of imposing penalties by the Office had changed in the direction of tightening penalties and that the court agrees with this direction.

In Bank Millennium's assessment, the Court should not assess Bank Millennium's behaviour in 2015 from the perspective of today's case-law views on the importance of abstract control (it was not until January 2016 that the Supreme Court's resolution supporting the view of the OPCC Chairman was published), the more penalties for these behaviours should not be imposed using current policy. The above constitutes a significant argument against the validity of the judgment and supports the appeal which Bank Millennium submitted to the Court of second instance.

The second instance court, in its judgment of 24 February 2022, completely revoked the decision of the OPCC Chairman. On 31 August 2022, the OPCC Chairman lodged a cassation appeal to the Supreme Court. On 3 July 2024, the Supreme Court issued a decision accepting the cassation appeal for consideration. Bank Millennium believes that the prognosis regarding the litigation chances of winning the case before the Supreme Court is positive and therefore no provision has been recognized.

4. Bank Millennium (along with other banks) is also a party to the dispute with OPCC, in which the OPCC Chairman recognized the practice of participating banks, including Bank Millennium, in an agreement aimed at jointly setting interchange fee rates charged on transactions made with Visa and Mastercard cards as restrictive of competition, and by decision of 29 December 2006 imposed a fine on Bank Millennium in the amount of PLN 12.2 million (EUR 2.9 million). Bank Millennium, along with other banks, appealed the decision.

In connection with the judgment of the Supreme Court and the judgment of the Court of Appeal in Warsaw of 23 November 2020, the case is currently pending before the court of first instance - the Court of Competition and Consumer Protection. Bank Millennium has created a provision in the amount equal to the imposed penalty.

5. Bank Millennium is a defendant in two court proceedings, in which the subject of the dispute is the amount of the interchange fee. The total value of claims reported in these cases is PLN 729.2 million (EUR 171 million). The procedure with the highest value of the reported claim is the case is brought by PKN Orlen SA, the plaintiff demands payment of PLN 635.7 million (EUR 149.1 million). The plaintiff in this proceeding alleges that the banks acted under an agreement restricting competition on the acquiring services market by jointly setting the level of the national interchange fee in the years 2006-2014. In this case, Bank Millennium was sued jointly with another bank and card organisations. In the case brought by LPP S.A. the allegations are similar to those raised in the case brought by PKN Orlen SA, while the period of the alleged agreement is indicated as 2008-2014. In this case, the Bank is sued jointly and severally with another bank. The case was resolved positively for the Bank by the courts of both instances, and is currently at the stage of a cassation appeal filed by LPP S.A. The Supreme Court did not issue a decision regarding the acceptance of the cassation appeal for consideration. According to current estimates of the risk of losing a dispute in these matters, Bank Millennium did not create a provision. In addition, we point out that Bank Millennium participates as a side intervener in three other proceedings regarding the interchange fee. Other banks are the defendant. Plaintiffs in these cases also accuse banks of acting as part of an agreement restricting competition on the acquiring services market by jointly setting the level of the national interchange fee in the years 2008-2014.

- A lawsuit brought up by shareholder of PCZ S.A. in bankruptcy (PHM, then the European Foundation for Polish-Belgian Cooperation - EFWP-B, currently called The European Foundation for Polish-Kenyan Cooperation) against Bank Millennium S.A., worth of the dispute PLN 521.9 million (EUR 122.4 million) with statutory interest from 5 April 2016 until the day of payment. The plaintiff filed the suit dated 23 October 2015 to the Regional Court in Warsaw; the suit was served to Bank Millennium on 4 April 2016. According to the plaintiff, the basis for the claim is damage to their assets, due to the actions taken by Bank Millennium and consisting in the wrong interpretation of the Agreement for working capital loan concluded between Bank Millennium and PCZ S.A., which resulted in placing the loan on demand. Bank Millennium is requesting complete dismissal of the suit, stating disagreement with the charges raised in the claim. Supporting the position of Bank Millennium, the Bank's attorney submitted a binding copy of final verdict of Appeal Court in Wrocław favourable to Bank Millennium, issued in the same legal state in the action brought by PCZ SA against Bank Millennium. On 10 May 2023, the Court of First Instance announced a judgment dismissing the claim in its entirety. The verdict is not final, the plaintiff filed an appeal.

On 6 May 2024, the Bank Millennium's representative submitted a response to the appeal, requesting that it be dismissed in its entirety as unfounded. On 17 December 2024, the Court of Appeal in Warsaw issued a judgment favourable to the Bank, dismissing the Plaintiff's appeal. The judgment is final. The Bank has been served with the Plaintiff's cassation complaint and has submitted a formal response. The Bank is of the opinion that there is a strong likelihood that the Supreme Court will decline to admit the cassation complaint for substantive review.

6. On 3 December 2015 a class action was served on Bank Millennium. A group of Bank Millennium's debtors (454 borrowers party to 275 loan agreements) is represented by the Municipal Consumer Ombudsman in Olsztyn. The plaintiffs demanded payment of the amount of PLN 3.5 million (EUR 0.8 million), claiming that the clauses of the agreements, pertaining to the low down payment insurance, are unfair and thus not binding. Plaintiff extended the group in the court letter filed on 4 April 2018, therefore the claims increased from PLN 3.5 million (EUR 0.8 million) to over PLN 5 million (EUR 1.2 million).

Actual status:

On 1 October 2018, the group's representative corrected the total amount of claims pursued in the proceedings and submitted a revised list of all group members, covering the total of 697 borrowers – 432 loan agreements. The value of the subject of the dispute, as updated by the claimant, is PLN 7,371,107.94 (EUR 1,729,048.8).

By the resolution of 1 April 2020 the court established the composition of the group as per request of the plaintiff and decided to take witness evidence in writing. On 18 October 2024, the Court adjourned the hearing without setting a new date. The court decided to disregard the evidence from the hearing of the parties and obliged the parties to submit documents - agreements concluded between the group members and the Bank and final judgments regarding the agreements in question. The court adjourned the hearing without specifying a new date. The Bank submitted the above-mentioned documents in a letter dated 17 December 2024, while the group representative, in performance of the obligation, submitted two letters containing documents confirming the legitimacy of individual group members. The court obliged the Bank to submit a position in response to the letters of the group representative. The obligation has been fulfilled.

The Bank Millennium has recognized a provision for this case in the amount of PLN 4.4 million (EUR 1 million).

As at 30 September 2025, there were also 70 individual court cases regarding LTV (loans-to-value) insurance (cases in which only a claim for the reimbursement of the commission or LTV insurance fee is presented).

7. On 13 August 2020, Bank Millennium received lawsuit from the Financial Ombudsman. The Financial Ombudsman, in the lawsuit, demands that Bank Millennium and the Insurer (TU Europa) be ordered to discontinue performing unfair market practices involving, as follows:

- presenting the offered loan repayment insurance as protecting interests of the insured in case when insurance structure indicates that it protects Bank Millennium's interests;
- use of clauses linking the value of insurance benefit with the amount of borrower's debt;
- use of clauses determining the amount of insurance premium without prior risk assessment (underwriting);
- use of clauses excluding insurer's liability for insurance accidents resulting from earlier causes.

Furthermore, the Ombudsman requires Bank Millennium to be ordered to publish, on its web site, information on use of unfair market practices.

The lawsuit does not include any demand for payment, by Bank Millennium, of any specified amounts. Nonetheless, if the practice is deemed to be abusive it may constitute grounds for future claims to be filed by individual clients.

The case is being examined by the court of first instance. The court is still continuing the evidentiary proceedings.

8. By 30 September 2025, Bank Millennium received 2,073 lawsuits in which the plaintiffs (both clients and companies purchasing claims), alleging violation of the information obligations and demanding reimbursement of interest and other costs incurred in connection with taking out a loan.

Based on publicly available information, it can be assumed that there will be an increase in the number of lawsuits concerning the free loan sanction. This phenomenon affects the entire banking services sector. It is likely that a "new business model" will be created in the area of law firms, which involves questioning consumer credit agreements.

As at 30 September 2025, 304 cases have been legally concluded, in 267 cases the Bank won the dispute and lost in 37 cases. Disputes in the above respect are subject to constant observation and analysis. In the cases in question, the Bank makes an individual assessment of the litigation chances in each of the court cases, which is justified by the lack of a uniform line of jurisprudence. Currently, the Bank's litigation chances in the cases in question are assessed positively.

On 13 February 2025, the Court of Justice of the European Union (CJEU) issued a judgment in a case registered under the reference number C472/23 as a result of an application filed by the District Court for the Capital City of Warsaw. In its judgment, the CJEU, interpreting the provisions of Directive 2008/48/EC of the European Parliament and of the Council of 23 April 2008 on consumer credit agreements, found that:

(i) the fact that a credit agreement indicates an annual percentage rate which turns out to be inflated because certain terms of that agreement were subsequently found to be unfair within the meaning of Article 6(1) of Council Directive 93/13/EEC of 5 April 1993 on unfair terms in consumer contracts and therefore not binding on the consumer, does not in itself constitute an infringement of the obligation to provide information laid down in that provision of Directive 2008/48.

(ii) the fact that a credit agreement lists a number of circumstances justifying an increase in the fees related to the performance of the agreement, without a properly informed and sufficiently observant and reasonable consumer being able to verify their occurrence or their impact on those fees, constitutes an infringement of the information obligation laid down in that provision, provided that this indication may undermine the consumer's ability to assess the extent of his obligation.

(iii) Directive 2008/48 does not preclude national legislation which provides, in the event of a breach of the obligation to provide for information imposed on the creditor in accordance with Article 10(2) of that directive, a uniform penalty consisting in depriving the creditor of the right to interest and fees, irrespective of the individual degree of gravity of such a breach, provided that such breach may undermine the consumer's ability to assess the extent of his obligation.

Following the judgment of the Tribunal, it is still up to the domestic courts to assess the possibility of crediting non-interest costs of the loan and to assess compliance with the information obligation regarding the possibility of changing fees. The CJEU also noted that the right to benefit from the free loan sanction is updated only if a potential breach of the bank may undermine the consumer's ability to assess the scope of his liability. Law firms purchasing clients' receivables publicize the judgment as a ruling with a favourable ruling for consumers (opposite to the view of the Bank), which may translate into an increase in the number of new cases.

On 9 October 2025, the Court of Justice of the European Union, in case registered under reference C-80/24, following a request submitted by the District Court for Warsaw – Śródmieście in Warsaw, while interpreting the provisions of Directive 2008/48/EC of the European Parliament and of the Council of 23 April 2008 on credit agreements for consumers and repealing Council Directive 87/102/EEC, as well as Council Directive 93/13/EEC of 5 April 1993 on unfair terms in consumer contracts, held that:

(i) Article 22(2) of Directive 2008/48/EC of the European Parliament and of the Council of 23 April 2008 on credit agreements for consumers and repealing Council Directive 87/102/EEC must be interpreted as meaning that it does not preclude national legislation allowing a consumer to assign to a third party, who is not a consumer, a claim based on the infringement of a right granted to him under national provisions implementing that Directive.

(ii) Articles 6(1) and 7(1) of Council Directive 93/13/EEC of 5 April 1993 on unfair terms in consumer contracts must be interpreted as meaning that a national court is not required to examine of its own motion the unfair nature of a term in an assignment agreement concluded by a consumer, where the dispute pending before that court between the assignee company and the trader does not concern that assignment agreement but rather the consumer's claim against that trader.

On 21 March 2025, the Financial Stability Committee issued a resolution (No. 79/2025) on the position regarding the risk associated with the sanction of free credit (SKD). The Committee noted that "while the violations listed in the Consumer Credit Act are of a varied nature and severity, the sanction itself is not subject to gradation. The inability to moderate sanctions creates a system of incentives to instrumentally use the benefits of the SKD and to undermine credit agreements, regardless of whether the violation has economic consequences for the borrower or not."

On 19 September 2025, the Financial Stability Committee convened. In the communiqué issued following the meeting, the Committee stated: "in the context of SKD-related risk, the Committee concluded that the draft Consumer Credit Act presented for public consultation did not adequately reflect the FSC's position on the risks associated with the application of the free credit sanction. The Committee notes that no regulatory measures have been introduced that sufficiently restrict the scope and possibility of applying this sanction. The Committee continues to identify areas that may facilitate the misuse of legal provisions intended to protect consumers."

As at 30 September 2025, the Bank Millennium had not recognized provisions for legal risk related to the free loan sanction.

9. By 30 September 2025, Bank Millennium recorded the receipt of 211 lawsuits by borrowers of mortgage loans in PLN for reimbursement of benefits provided under the loan agreement. Three final and favourable rulings for the Bank were issued. The borrowers' allegations focus on the WIBOR ratio as an incomprehensible, unverifiable element affecting the consumer's liability, as well as the issue of insufficient information on the effects of variable interest rates provided to the consumer by the bank before the conclusion of the contract.

Based on publicly available information, it can be assumed that there will be an increase in the number of lawsuits concerning mortgage loans in PLN. This phenomenon affects the entire sector of banking services. It is possible that a "new business model" will be created in the area of law firms, which consists in questioning mortgage contracts containing a variable interest rate clause based on the WIBOR reference index.

On 29 June 2023, the Polish Financial Supervision Authority (KNF) announced that it had assessed the ability of the WIBOR interest rate reference index to measure the market and economic realities. The KNF stated that the WIBOR interest rate reference index is capable of measuring the market and economic realities for which it was established. According to the Commission's assessment, the WIBOR ratio responds appropriately to changes in liquidity conditions, changes in central bank rates and economic realities (https://www.knf.gov.pl/komunikacja/komunikaty?articleId=82924&p_id=18).

On 26 July 2023, the Polish Financial Supervision Authority (PFSa) presented its position on legal and economic issues related to mortgage loan agreements in Polish currency in which the WIBOR interest rate reference index is used. This position can be used in court proceedings and can then be treated as an 'amicus curiae' opinion. The Polish Financial Supervision Authority stated that the WIBOR reference index meets all legal requirements. In the opinion of the Polish Financial Supervision Authority, there are no grounds to question the credibility and legality of WIBOR, in particular in the context of the use of this indicator in mortgage loan agreements in the Polish currency.

As at 30 September 2025, the Bank Millennium had not recognised provisions for legal risk related to mortgage loans in PLN.

10. Currently, in connection with the activities of Bank Millennium - as it is the case with the activities of other banks in Poland - the President of the Office of Competition and Consumer Protection is conducting proceedings on the use of practices infringing the collective interests of consumers as regards the so-called "unauthorized transactions". In the opinion of the President of the Office of Competition and Consumer Protection, in the case of Bank Millennium, such actions include the following:

(i) failure – no later than by the end of the business day after the date of receipt of an appropriate notification from the consumer regarding the occurrence of an unauthorised payment transaction – to refund the amount of the unauthorised payment transaction or to restore the debited payment account to the state that would have existed if the unauthorised payment transaction had not taken place, despite the lack of justified and duly documented grounds to suspect fraud on the part of the consumer and informing the authorities appointed to prosecute crimes about this suspicion in writing, as well as;

(ii) providing consumers – in the replies to their reports regarding the occurrence of unauthorized payment transactions – with information about the verification by the payment service provider of the correct use of the payment instrument by using individual authentication data in a way suggesting that the Bank's demonstration only that the disputed payment transactions have been correctly authenticated constitutes at the same time demonstration of the authorization of such a transaction and excludes its obligation to return the amount of the unauthorized transaction and;

(iii) providing consumers – in the replies to their reports regarding the occurrence of unauthorized payment transactions – with false information about authorization of the transactions questioned by consumers, while presenting information indicating that the transactions took place as a result of an intentional or grossly negligent violation by consumers of at least one of the obligations referred to in Article 42 of the Payment Services Act and in the agreement between the consumer and the bank, as a result of which they are liable for the questioned payment transactions.

In the course of the proceedings, the Bank provided appropriate explanations and also substantively referred to the allegations formulated by the President of the Office of Competition and Consumer Protection. The proceedings have been extended until the end of 2025.

On 18 April 2025, Bank Millennium filed an application for a binding decision pursuant to Article 28 section 1 of the Act on Competition and Consumer Protection. The application (proposal) includes all allegations presented by the UOKiK, i.e. changes in the procedure for handling reports regarding unauthorized payment transactions, changes in the classification of a given transaction as authorized and changes in complaint response templates. The application also includes a proposal for "compensation" for customers whose complaints were rejected. Currently, discussions with the President of the UOKiK regarding the issuance of a commitment decision are still ongoing.

In connection with the proceedings, the Bank Millennium recognised a provision as at the end of September 2025 in the amount of PLN 82 million (EUR 19.2 million) based on estimated outflow of funds.

As at 30 September 2025, the Bank Millennium was a party to 348 court proceedings in which customers questioned the fact of their authorization of a transaction. In the cases in question, the Bank Millennium makes an individual assessment of the litigation chances in each of the court cases. In cases where, in the Bank's opinion, there is a greater probability of losing the dispute than winning it, provisions in the amount resulting from the potential loss of the Bank are created.

As at 30 September 2025, the total value of the subjects of the other litigations in which the Bank Millennium Group's companies appeared as defendant, stood at PLN 5,563.2 million (EUR 1,314.1 million) (excluding the class actions described in note 53. In this group the most important category are cases related with FX loans mortgage portfolio.

11. On 1 October 2015, a set of entities connected to a group with debts in default to BCP amounting to EUR 170 million, resulting from a loan agreement signed in 2009 - debts already fully provisioned in the Bank's accounts -, filed against BCP, after receiving the Bank's notice for mandatory payment, a lawsuit requesting that:

a) the court declares that two of the defendants are mere fiduciary owners of 340,265,616 BCP shares, since they acted pursuant to a request made by the Bank for the making of the respective purchases, and also that the court orders the cancellation of the registration of those shares in the name of those companies;

b) the court declares the nullity of the financing agreement established between the plaintiffs and the Bank, due to relative simulation;

c) the court sentences the Bank, in accordance with the legal regime of the mandate without representation, to become liable for the amounts due to the institution, abstaining from requesting those amounts to the plaintiffs and to refund them the cost they incurred while complying with that mandate, namely, EUR 90,483,816.83 regarding Banco Espírito Santo, S.A. (BES) and EUR 52,021,558.11 regarding Caixa Geral de Depósitos, S.A. (CGD), plus default interests;

d) the amount of the lawsuit determined by the plaintiffs is EUR 317,200,644.90;

e) the Bank opposed and presented a counter claim, wherein it requests the conviction, namely, of a plaintiff company in the amount of EUR 185,169,149.23 for the loans granted, plus default interests and stamp tax.

The court issued a curative act and already ascertained the factual basis that are proven and that must be proven.

The expertise was carried out and the expert report submitted.

In November 2022 the Bank complained about the Experts' Report: (i) they considered documents that the Court had ordered to be removed from the proceedings, which had not been done due to the Court's inertia, (ii) they considered written notes on documents, that may have been written by the entities that initiated the process, and (iii) they did not consider much information that was contained in the statements, and (iv) they made errors in the calculation of interest and the amount of financing granted. In view of the experts' new reply, BCP claimed all the expertise, in March 2023. For the Court's final decision, BCP added, in June this year, a set of documents supporting its position.

On 24 October 2025, complaints regarding the expert assessment remain pending.

12. Resolution Fund

Resolution measure of Banco Espírito Santo, S.A.

On 3 August 2014, with the purpose of safeguarding the stability of the financial system, Banco de Portugal applied a resolution measure to Banco Espírito Santo, S.A. (BES) in accordance with the Article 145-C (1.b) of the Decree-law 298/92, of 31 December 1992, as amended (the "Banking Law"), which entailed, *inter alia*, the partial transfer of assets, liabilities, off-balance sheet items and assets under management into a transition bank, Novo Banco, S.A. (Novo Banco), incorporated on that date by a decision issued by Banco de Portugal. Within the scope of this process, the Resolution Fund made a capital contribution to Novo Banco amounting to EUR 4,900 million, becoming, on that date, the sole shareholder. Further, in accordance with information published on the Resolution Fund's website, the Resolution Fund borrowed EUR 4,600 million, of which EUR 3,900 million were granted by the Portuguese State and EUR 700 million by a group of credit institutions, including the Bank.

As announced on 29 December 2015, Banco de Portugal transferred to the Resolution Fund the liabilities emerging from the *"eventual negative effects of future decisions regarding the resolution process that may result in liabilities or contingencies"*.

On 7 July 2016, the Resolution Fund declared that it would analyse and evaluate the diligences to be taken, following the publication of the report on the result of the independent evaluation, made to estimate the level of credit recovery for each category of creditors under a hypothetical scenario of a normal insolvency process of BES on 3 August 2014.

In accordance with the applicable law, when the BES liquidation process is over, if it is verified that the creditors, whose credits were not transferred to Novo Banco, would take on a higher loss than the one they would hypothetically take if BES had gone into liquidation right before the application of the resolution measure, such creditors shall be entitled to receive the difference from the Resolution Fund.

On 31 May 2019, the Liquidation Committee of BES presented a list of all the acknowledged and a list of the non-acknowledged creditors before the court and the subsequent terms of the proceedings. These lists detail that the total acknowledged credits, including capital, remunerative and default interest amounts to EUR 5,056,814,588, of which EUR 2,221,549,499 are common credits and EUR 2,835,265,089 are subordinated claims, and no guaranteed or privileged claims exist. Both the total number of acknowledged creditors and the total value of the acknowledged credits and their ranking will only be ultimately determined upon the definitive judicial judgement of the verification and ranking of credits to be given in the liquidation proceedings.

According to the Resolution Fund's Annual Report of 2024, "in 2019, the Resolution Fund was informed that the credits (it) claimed had not been recognised by the Liquidation Commission of BES – In Liquidation, whilst the Resolution Fund filed an objection to the list of creditors with the Lisbon District Court, requesting that the credits it claimed be recognised. The challenge was upheld and the Liquidation Committee of BES – In Liquidation appealed. In 2023, the Lisbon Court of Appeal issued a judgement dismissing the appeal of the Liquidation Commission of BES - In Liquidation, and in favour of the position defended by the Resolution Fund, confirms the decision of the Court of First Instance and the recognition of the credits claimed by the Resolution Fund as privileged credits. The Liquidation Commission of BES - In Liquidation, filed an appeal for review before the Supreme Court of Justice, which issued a judgement in July 2023, which has already become final, recognising, and classifying as privileged the credits claimed by the Resolution Fund for the total amount of EUR 1,242,568.9 thousand".

Following the resolution measure of BES, a significant number of lawsuits against the Resolution Fund was filed and is underway. According to note 25 of the Resolution Fund's Annual Report of 2024, *"Legal actions related to the application of resolution measures have no definitive legal precedents, which makes it impossible to use case law in its evaluation, as well as to obtain a reliable estimate of the associated contingent financial impact. (...) The Resolution Fund, supported by legal advice of the attorneys for these actions, and in light of the legal and procedural information available so far, considers that there is no evidence to cast doubt on their belief that the probability of success is higher than the probability of failure"*.

According to note 24 of the Resolution Fund's Annual Report of 2024, *"In addition to the Portuguese courts, it is important to take into account the litigation of Novo Banco, S.A., in other jurisdictions, being noteworthy, for its materiality and respective procedural stage, the litigation in the Spanish jurisdiction"*.

On 31 March 2017, Banco de Portugal communicated the sale of Novo Banco, where it states the following: *"Banco de Portugal today selected Lone Star to complete the sale of Novo Banco. The Resolution Fund has consequently signed the contractual documents of the transaction. Under the terms of the agreement, Lone Star will inject a total of EUR 1,000 million in Novo Banco, of which EUR 750 million at completion and EUR 250 million within a period of up to 3 years. Through the capital injection, Lone Star will hold 75% of the share capital of Novo Banco and the Resolution Fund will maintain 25% of the share capital"*.

The terms agreed also included a Contingent Capital Agreement (CCA), under which the Resolution Fund, as a shareholder, undertakes to make capital injections if certain cumulative conditions are met related to the performance of a specific portfolio of assets and to the capital ratios of Novo Banco going forward.

The terms agreed also provide for mechanisms to safeguard the interests of the Resolution Fund, to align incentives as well as monitoring mechanisms, notwithstanding the limitations arising from State Aid rules.

On 18 October 2017, following the resolution of the Council of Ministers 151-A/2017 of 2 October 2017, Banco de Portugal communicated the conclusion of the sale of Novo Banco to Lone Star, with an injection by the new shareholder of EUR 750 million, followed by a further capital increase of EUR 250 million by the end of 2017. Upon completion of the transaction, the status of Novo Banco as a bridge institution ceased, fully complying with the purposes of the resolution of BES.

On 26 February 2018, the European Commission published the non-confidential version of its decision regarding the approval of State aid underlying Novo Banco's sale process. This statement identifies the three support measures by the Resolution Fund and the Portuguese State that are part of the sale agreement associated with a total gross book value of around EUR [10-20] billion⁽¹⁾ that revealed significant uncertainties regarding adequacy in provisioning⁽²⁾:

- (i) Contingent Capital Agreement (CCA) which allows Lone Star to reclaim, from the Resolution Fund, funding costs, realised losses and provisions related to an ex-ante agreed portfolio of existing loan stock, up to a maximum of EUR 3.89 billion, subject to a capital ratio trigger (CET1 below 8%-13%) as well as to some additional conditions⁽¹⁾⁽²⁾⁽³⁾;
- (ii) Underwriting by the Resolution Fund of a Tier 2 instrument to be issued by Novo Banco up to the amount necessary (but no more than EUR 400 million). The amount that can be reclaimed by the Resolution Fund under the CCA is subject to the cap of EUR 3.89 billion⁽²⁾;
- (iii) In case the Supervisory Review and Evaluation Process ("SREP") total capital ratio of Novo Banco falls below the SREP total capital requirement, the Portuguese State will provide additional capital in certain conditions and through different instruments⁽²⁾. According to the audit report on the management of Novo Banco conducted by the Court of Auditors and released on 12 July 2022, "the risk of triggering the additional capital mechanism (capital backstop), up to EUR 1.6 billion, provided for in the commitments made by the Portuguese State to ensure the viability of NB, exists".

On 9 September 2020, BCP informed that it has decided not to continue with the legal proceeding before the General Court of the European Union with a view to partially annul the European Commission's decision regarding its approval of the CCA of Novo Banco.

According to a statement issued by the Resolution Fund on 13 February 2023, "the Ministry of Finance has disclosed that the European Commission intends to consider the restructuring process of Novo Banco as completed. The information disclosed today confirms the successful restructuring of Novo Banco, resulting from the combined execution of the restructuring plan agreed in 2017, under the sale transaction conducted by Banco de Portugal, and the sale agreements, namely the CCA, under which the Resolution Fund transferred to Novo Banco EUR 485 million, less than the maximum amount set in the contract (EUR 3,890 million). The completion of the restructuring of Novo Banco, is also another indicator that Novo Banco should not need to request any further payment to the Resolution Fund under the CCA, without prejudice to the ongoing litigation or that still may occur regarding the amounts already requested by Novo Banco in relation to past years and that the Resolution Fund considers that are not due.

On the same day, Banco de Portugal issued the following statement "The conclusion of the Novo Banco restructuring process also results in the end of the backstop mechanism, which provided for the possibility, which was always considered remote, of the Portuguese State providing extraordinary support to Novo Banco in extreme scenarios. This mechanism protected Novo Banco and the national financial system from more adverse scenarios, which did not materialise. With the end of the backstop, the financial risk for the Portuguese State is eliminated".

On 9 December 2024, the Resolution Fund announced in a statement that it had signed an agreement ending the Contingent Capitalization Agreement (CCA) signed in 2017 as part of the Novo Banco sale. This agreement brings forward by around a year the end of the CCM, which until now had been scheduled for the end of 2025, definitively extinguishing any possibility of Novo Banco requesting further payments from the Resolution Fund. The main terms and conditions of the agreement to bring forward the end of the MCC include:

- Immediate termination of the CCA, bringing forward the maturity of the contract, scheduled for the end of 2025, which implies, in particular, that no new payment requests can be made by Novo Banco, that operations relating to the assets covered by the Agreement no longer require the Resolution Fund's opinion, and that the Monitoring Committee is also extinguished, and that the impediment to the distribution of dividends by Novo Banco, which was stipulated in the MCC, ceases.

⁽¹⁾ Exact value not disclosed by the European Commission for confidentiality reasons

⁽²⁾ As referred to in the respective European Commission Decision

⁽³⁾ According to 2018 Novo Banco's earnings institutional presentation, the "minimum capital condition" is (i) CET1 or Tier 1 < CET1 or Tier 1 SREP requirement plus a buffer for the first three years (2017-2019); (ii) CET1 < 12%

- The existing payment obligations between the parties as a result of the CCA, as well as all litigation and disputes related to the implementation of the agreement, are settled - without any transfer of funds.

- The Resolution Fund's contingent liabilities associated with the alleged breach of the "Business Warranties" assumed in the Novo Banco sale agreement are extinguished, namely with the waiver of the compensation claims preliminarily presented by Nani Holdings, which amounted to around EUR 60 million.

- The mechanism whereby the stake in Novo Banco held by Nani Holdings is not diluted in the event of capital increases because of the application and under the terms of the Special Regime Applicable to Deferred Tax Assets is extinguished.

The agreement allows for a significant reduction in the Resolution Fund's liabilities (in excess of EUR 73 million in net terms, based on the amounts claimed by Novo Banco), as well as allowing for the extinction of potentially significant contingencies. Thus, all the Resolution Fund's obligations relating to the CCA are definitively closed. The amount paid by the Resolution Fund was therefore EUR 485 million below the maximum amount provided for in the contract (EUR 3,890 million) and EUR 936 million below the aggregate amount of losses "covered" by the contingent capitalization mechanism (EUR 4,341 million, as at 30/06/2024).

With the expiry of the Contingent Capitalisation Agreement, the payments made by the Resolution Fund will be limited to the EUR 3,405 million that the Resolution Fund considered to be due, between 2018 and 2021.

According to a statement issued by the Banco de Portugal on 9 December 2024 on the end of the contingent capitalization agreement signed in the context of the sale of Novo Banco, "The CCA and the management of the assets that comprised it were subject to numerous internal and external audits, as provided for in the original Agreement, carried out by independent entities hired for this purpose. To this was added the monitoring carried out by the supervisory authorities and others with powers to do so within the legal framework in force, including the European Central Bank and the Court of Auditors."

According to Novo Banco's 2025 first half Report (note 28), Novo Banco adhered to the Special Regime applicable to Deferred Tax Assets under Law 61/2014, of 26 August (REPID), according to which, the deferred tax assets recorded until 31 December 2015 can be converted into tax credits when the taxable entity reports an annual net loss, in accordance to the proportion of the amount of the said net loss to total equity at the individual company level. A special reserve was established with an amount identical to the tax credit approved, increased by 10%. The conversion rights are securities that entitle the State to require Novo Banco to increase its share capital by incorporating the amount of the special reserve and consequently issuing and delivering free of charge ordinary shares. The shareholders have the right to acquire the conversion rights attributed to the Portuguese State.

According to the Resolution Fund's 2024 Annual Report, under the terms of the sale of Novo Banco, the Fund is required to maintain Nani Holdings' stake at 75% when that stake is affected by capital increases carried out under the terms of the REPID.

According to the Resolution Fund's 2024 Annual Report, under REPID, Novo Banco, S. A., carried out three capital increases by incorporation of reserves, through the rights conversion that had been attributed to the State as a result of the conversion, into tax credits, of Novo Banco's deferred tax assets with reference to the 2015 to 2019 tax periods.

According to Novo Banco's 2025 first half Report, Novo Banco carried out another capital increase following the conversion of the conversion rights granted by the State for the 2020 fiscal year, fully subscribed by the Resolution Fund.

On 13 June 2025, it was announced that a Memorandum of Understanding had been signed between the Lone Star funds and the BPCE Group for the sale of the 75% stake held by Lone Star in Novo Banco. The acquisition will be carried out for an estimated amount of EUR 6.4 billion for 100% of Novo Banco's share capital and is expected to be completed in early 2026.

On 29 October 2025, the Ministry of Finance and the Resolution Fund signed an agreement with BPCE Group and Nani Holdings for the sale of minority stakes held in the institution (specifically, 11.5% by the Portuguese State and 13.5% by the Resolution Fund) under the same financial conditions.

Following the completion of the process, BPCE Group will become the sole shareholder of Novo Banco.

According to the Resolution Fund's statement dated 13 June 2025, the sale of its stake as part of this transaction will result in a gross inflow of approximately EUR 866 million. This amount will be used to repay the Resolution Fund's debt, particularly to the State.

Resolution measure of Banif – Banco Internacional do Funchal, S.A.

On 19 December 2015, the Board of Directors of Banco de Portugal announced that Banif “*was failing or likely to fail*” and started an urgent resolution process of the institution through the partial or total sale of its activity, which was completed on 20 December 2015 through the sale to Banco Santander Totta S.A. (BST) of the rights and obligations of Banif, formed by the assets, liabilities, off-balance sheet items and assets under management. The largest portion of the assets that were not sold, were transferred to an asset management vehicle denominated Oitante, S.A. (Oitante) specifically created for that purpose, having the Resolution Fund as the sole shareholder. For that matter, Oitante issued bonds representing debt in the amount of EUR 746 million. The Resolution Fund provided a guarantee and the Portuguese State a counter-guarantee. The operation also involved State aid, of which EUR 489 million were provided by the Resolution Fund, which was funded by a loan granted by the State.

On 12 January 2021, Banco de Portugal was informed that the Administrative and Fiscal Court of Funchal dismissed a lawsuit involving several disputes associated to Banif’s resolution measures applied by Banco de Portugal. In its decision, the Court determined the legality and maintenance of Banco de Portugal’s measures.

On 4 July 2022, Oitante - 100% owned by the Resolution Fund - completed the process of repayment of the bonds issued in connection with the resolution of BANIF. Oitante’s debt. With the repayment of the debt, the Resolution Fund’s responsibility as guarantor also ceases, as well as the Portuguese State’s responsibility as provider of a counter-guarantee.

According to the Resolution Fund (press release dated 23 June 2025), Oitante approved the distribution of dividends to the Resolution Fund by EUR 13.1 million. With this new distribution, the amount delivered by Oitante to the Resolution Fund totals EUR 163.1 million since the company was set up. The amounts received and to be received by the Resolution Fund, given its 100% participation in Oitante’s capital, contribute to reducing the losses of Euro 489 million incurred by this Fund in the resolution of BANIF and will be used to repay the debts of the Resolution Fund.

On 16 January 2023, the Liquidation Committee of Banif announced a list of all the acknowledged and a list of the non-acknowledged creditors. According to the Resolution Fund’s 2023 Annual Report, the Resolution Fund holds a claim on Banif of EUR 489 million, which has a higher claim ranking provided for in article 166-A of the RGICSF. Under the judicial liquidation process of Banif, which was initiated following the resolution, the independent evaluator estimates that the level of recovery of the financial support made available by the Resolution Fund, as having a higher ranking at the end of the liquidation, is expected to be 7.6%.

Liabilities and financing of the Resolution Fund

Pursuant to the resolution measures applied to BES and Banif, the Resolution Fund incurred on loans and assumed other responsibilities and contingent liabilities resulting from:

- The State loans, on 31 December 2024, included the amounts made available (i) in 2014 for the financing of the resolution measure applied to BES (EUR 3,900 million); (ii) to finance the absorption of Banif’s losses (EUR 353 million); (iii) under the framework agreement concluded with the State in October 2017 for the financing of the measures under the CCA (EUR 430 million plus EUR 850 million of additional funding requested in 2019 and EUR 850 million made available in 2020);

- Other funding received:

- in 2014 by seven domestic institutions in the amount of EUR 700 million, in which the Bank participates, within the scope of BES resolution measure;
- in 2021 by seven domestic credit institutions, including BCP, to finance payments due under the CCA up to a maximum of EUR 429 million;

- The underwriting by the Resolution Fund of a Tier 2 instrument to be issued by Novo Banco up to the amount of EUR 400 million did not take place as the instruments were placed with third party investors as disclosed by Novo Banco on 29 July 2018;

- Effects of the application of the principle that no creditor of the credit institution under resolution may assume a loss greater than the one it would take if that institution did not go into liquidation;

- Negative effects resulting from the resolution process that result in additional liabilities or contingencies for Novo Banco, which must be neutralized by the Resolution Fund;
- Legal proceedings filed against the Resolution Fund;
- Guarantee granted to secure the bonds issued by Oitante, S.A.;
- CCA that allows Lone Star to claim, from the Resolution Fund, funding costs, realised losses and provisions related to the aforementioned ex-ante portfolio of existing loan stock agreed upon the sale process to Lone Star up to EUR 3.89 billion under the aforementioned conditions, among which a reduction of Novo Banco's CET1 below 8%-13%;
- In case the Supervisory Review and Evaluation Process (SREP) total capital ratio of Novo Banco falls below the SREP total capital requirement, the State will provide additional capital in certain conditions and through different instruments as referred to in the respective European Commission Decision.

To meet a payment from the Resolution Fund to Novo Banco, as per to Resolution 63-A/2021 of 27 May 2021 of the Council of Ministers and Order from the Minister of State and Finance, of 31 May 2021 - intended to provide the Resolution Fund with the financial resources necessary to meet any obligations arising from the Contingent Capitalisation Agreement in the years 2021 and 2022 – rendering a new loan from the State to the Resolution Fund, a number of national financial institutions offered to finance the Resolution Fund, increasing up to EUR 475 million the direct financing of banks to the Resolution Fund and waiving a Portuguese State loan to the Resolution Fund.

According to the Resolution Fund's 2024 Annual Report from the maximum amount of EUR 475 million. The Resolution Fund used EUR 429 million, which corresponds to the payment made to Novo Banco in 2021. The loan matures in 2046 and bears interest at a rate corresponding to the sovereign cost of funding for the period between the contract date (31 May 2021) and 31 December 2026, plus a margin of 15 b.p. The interest rate will be reviewed on 31 December 2026 and, after that, every five-years. The payment obligations arising from this loan benefit from a pari passu treatment with the payment obligations of the loans entered into with the Portuguese State on 7 August 2014 and 31 December 2015 and with the Portuguese credit institutions on 28 August 2014. The funding costs of the Resolution Fund (from the State and from banks) will continue to be exclusively borne by periodic revenues, corresponding to the contributions paid by the banking sector.

According to note 27 of the Resolution Fund's 2024 Annual Report, the Resolution Fund considers that, to date, there are no elements that allow a reliable estimate of the potential financial effect of these potential liabilities.

By a public statement on 28 September 2016, the Resolution Fund and the Ministry of Finance communicated the agreement based on a review of the terms of the EUR 3,900 million loan originally granted by the State to the Resolution Fund in August 2014 to finance the resolution measure applied to BES. According to the Resolution Fund, the extension of the maturity of the loan was intended to ensure the ability of the Resolution Fund to meet its obligations through its regular revenues, regardless of the contingencies to which the Resolution Fund is exposed. On the same day, the Office of the Minister of Finance also announced that increases in the liabilities arising from the materialisation of future contingencies will determine the maturity adjustment of State and bank loans to the Resolution Fund, required from to maintain the contributory effort required from the banking sector at prevailing levels at that time.

According to the statement of the Resolution Fund of 21 March 2017:

- *"The conditions of the loans obtained from the Fund to finance the resolution measures applied to Banco Espírito Santo, S.A. and to Banif – Banco Internacional do Funchal, S.A. were changed. These loans amount to EUR 4,953 million, of which EUR 4,253 million were granted by the Portuguese State and EUR 700 million were granted by a group of banks";*

- *"Those loans are now due in December 2046, without prejudice to the possibility of early repayment based on the use of the Resolution Fund's revenues. The revision of the loan's terms aimed to ensure the sustainability and financial balance of the Resolution Fund. The terms allow the Resolution Fund to fully meet its liabilities based on regular revenues and without the need for special contributions or any other type of extraordinary contributions".*

According to the audit report on the management of Novo Banco conducted by the Court of Auditors and released on 12 July 2022, *"the repayment of the EUR 2,130 million loans granted by the Portuguese State to the Resolution Fund will not end in 2046, as expected, rather in 2056 (without payments under the CCA after 2021) or in 2059 (with the use of the CCA cap). (...) In other, more pessimistic scenarios, these loans will still be being repaid in 2062"*.

On 2 October 2017, by Resolution 151-A/2017, of the Council of Ministers of the Portuguese State, as the ultimate guarantor of financial stability, was authorised to enter into a framework agreement with the Resolution Fund, to make available the necessary financial resources to the Resolution Fund, if and when the State deemed necessary, to satisfy any contractual obligations that may arise from the sale of the 75% stake in Novo Banco. The above-mentioned resolution further set out that the framework agreement should be subject to a time period that is consistent with the undertakings of the Resolution Fund and should preserve the Resolution Fund's capacity to satisfy said obligations in due time.

As at 31 December 2024, the Resolution Fund's own resources had a negative equity of EUR 6,475.8 million, as opposed to EUR 6,735.1 million at the end of 2023, according to the latest 2024 Annual Report of the Resolution Fund.

To repay the loans obtained and to meet other liabilities that it may take on, the Resolution Fund receives proceeds from the initial and regular contributions from the participating institutions (including the Bank) and from the contribution over the banking sector (created under Law 55-A/2010). It is also provided for the possibility of the member of the Government responsible for the area of Finance to determine, by ordinance that the participating institutions make special contributions, in the situations provided for in the applicable legislation, particularly if the Resolution Fund does not have resources to satisfy its obligations.

Pursuant to Decree-Law 24/2013 of 19 February, which establishes the method for determining the initial, periodic and special contributions to the Resolution Fund, provided for in the Banking Law, the Bank has been paying, since 2013, its mandatory contributions set out in the aforementioned decree-law.

On 3 November 2015, the Banco de Portugal issued Circular Letter no. 085/2015/DES, under which it is clarified that the periodic contribution to the Resolution Fund should be recognised as an expense at the time of the occurrence of the event which creates the obligation to pay the contribution, i.e. on the last day of April of each year, as stipulated in Article 9 of the referred Decree-Law 24/2013, of 19 February, thus the Bank is recognising as an expense the contribution to the Resolution Fund in the year in which it becomes due.

Decree-Law 24/2013 of 19 February further sets out that Banco de Portugal has the authority to determine, by way of instruction ("instrução"), the applicable yearly rate based on objective incidence of periodic contributions. The instruction of Banco de Portugal no. 18/2024, published on 16 December 2024, set the base rate for 2025 for the determination of periodic contributions to the Resolution Fund at 0.049% (0.032% in 2024).

According to Article 5 (e) of the Regulation of the Resolution Fund, approved by the Ministerial Order 420/2012, of 21 December, the Resolution Fund may submit to the member of the Government responsible for finance a proposal with respect to the determination of amounts, time limits, payment methods, and any other terms related to the special contributions to be made by the institutions participating in the Resolution Fund. According to public communications from both the Resolution Fund and from the Government, there is no indication that any such special contributions are foreseen.

The Resolution Fund issued, on 15 November 2015, a public statement declaring: *"...it is further clarified that it is not expected that the Resolution Fund will propose the setting up of a special contribution to finance the resolution measure applied to BES. Therefore, the potential collection of a special contribution appears to be unlikely"*.

In 2015, following the establishment of the Single Resolution Fund (SRF), the Group made an initial contribution in the amount of EUR 31,364 thousand. In accordance with the Intergovernmental Agreement on the Transfer and Mutualisation of Contributions to the SRF, this amount was not transferred to the SRF but was used instead to partially cover for the disbursements made by the Resolution Fund in respect of resolution measures prior to the date of application of this Agreement. This amount will have to be reinstated over a period of 8 years (started in 2016) through the periodic contributions to the SRF. The Single Resolution Fund does not cover undergoing situations with the National Resolution Fund as at 31 December 2015. In 2024, no contribution was made to the Single Resolution Fund attributable to the Group (BCP and ActivoBank) according to information from the SRB – Single Resolution Board of 10 February 2025, which states that the financial means available in the Single Resolution Fund at 31 December 2024 remains above the target level of at least 1% of covered deposits held in the Member States participating in the Single Resolution Mechanism, as set in article 69 (1) of Regulation (EU) 806/2014.

In the first half of 2025, the Group made regular contributions to the Portuguese Resolution Fund in the amount of EUR 10,166 thousand. The amount related to the contribution on the banking sector in Portugal, recorded in this period was EUR 22,409 thousand. These contributions were recognised as a cost in the first half of 2025, in accordance with IFRIC no. 21 – Levies.

It is not possible, on this date, to assess the effects on the Resolution Fund due to: (i) the sale of the shareholding in Novo Banco in accordance with the communication of Banco de Portugal dated 18 October 2017 and the information provided by the European Commission on this subject under the terms described above; (ii) the application of the principle that no creditor of the credit institution under resolution may take on a loss greater than the one it would take if that institution did not go into liquidation; and (iii) legal proceedings against the Resolution Fund.

13. Banco Comercial Português, S.A., Banco ActivoBank S.A. and Banco de Investimento Imobiliário, S.A. (company merged into Banco Comercial Português, S.A.) initiated an administrative proceeding to contest the resolution adopted by Banco de Portugal on 31 March 2017 to sell Novo Banco (NB), and also, as a precaution, the deliberation adopted by the Resolution Fund on the same date, as they foresee the sale of NB by resorting to a contingent capitalisation agreement under which the Resolution Fund commits to inject capital in Novo Banco up to EUR 3,9 billion, under determined circumstances. In the proceedings, the claimants request the declaration of nullity or annulment of those acts.

The proceedings were filed based on the information contained in the Communication from Banco de Portugal dated 31 March 2017, of which the claimants were not notified. The proceedings were filed in court on 4 September 2017. Banco de Portugal and the Resolution Fund presented their arguments and, only very recently, Nani Holdings SGPS, S.A. did the same since, by delay of the court, this company was only very recently notified to act as a party in the proceedings.

In addition to opposing to it, the defendants invoke three objections (i) the illegitimacy of the claimants, (ii) the argument that the act performed by Banco de Portugal cannot be challenged and (iii) the material incompetence of the court. The opponent party invoked the issue of passive illegitimacy since Novo Banco was not notified as an opponent party.

The claimants replied to the arguments presented by the defendants and to the arguments presented by the opponent party. After the presentation of the arguments, Banco de Portugal attached to the proceedings what it called an evidence process (allegedly in compliance with the law) but most of the documents delivered were truncated in such a way that neither the court nor the claimants are able to obtain adequate knowledge thereof. That issue was already raised in the proceedings (requesting the court to order Banco de Portugal to deliver a true evidence process) but no decision thereon has been made yet.

Currently, the proceedings are prepared for confirmation of the decision accepting the formalities of the right of action (with the making of a decision on the specific objections invoked). In case the judge considers that Novo Banco is an opponent party, the judge must start by issuing a pre-confirmation in order to request the claimants to identify it. Afterwards, that Bank will be notified to present its opposition arguments.

The proceeding was sent to the judge on 23 September 2019 and the Bank is awaiting a decision. BCP added legal opinions to the records (Professors Mário Aroso de Almeida and Manuel Fontaine de Campos).

As of 24 October 2025, this case remains inactive and remains pending before the judge (for a possible decision on the resolution of the case).

Since the case has not undergone any developments since the end of the written proceedings (in 2018), it is not possible to have a non-speculative expectation of its development or timetable for its conclusion, and it is not anticipated that the agreement for the sale of NB will influence this timetable.

14. The Bank was subject to tax inspections for the years up to 2022. As a result of the inspections in question, corrections were made by the tax authorities, arising from the different interpretation of some tax rules. The main impact of these corrections occurred regarding IRC, including in terms of the tax loss carry forwards and, in the case of indirect tax, in the calculation of the Value-Added Tax (VAT) deduction pro rata used for the purpose of determining the amount of deductible VAT and at the Stamp Duty level. Most of additional liquidations/corrections made by the tax administration were the object of contestation by administrative and/or judicial means.

The Bank recorded provisions, current tax liabilities or deferred tax liabilities at the amount considered sufficient to offset the tax or tax loss carry forwards, as well as the contingencies related to the fiscal years not yet reviewed by the tax administration.

53. Provisions for legal risk related to foreign currency-indexed mortgages in Bank Millennium (Poland)

1. Court claims and current provisions for legal risk

On 30 September 2025, Bank Millennium had 18,950 loan agreements and additionally 2,334 loan agreements from former Euro Bank under individual ongoing litigations (excluding claims submitted by Bank Millennium against clients i.e. debt collection cases) concerning indexation clauses of FX mortgage loans submitted to the courts (45% loans agreements before the courts of first instance and 55% loans agreements before the courts of second instance) with the total value of claims filed by the plaintiffs amounting to PLN 3,955.2 million (EUR 927.8 million) and CHF 324 million (EUR 346.7 million) [(Bank Millennium portfolio: PLN 3,452.6 million (EUR 809.9 million) and CHF 312.1 million (EUR 334 million) and former Euro Bank portfolio: PLN 502.6 million (EUR 117.9 million) and CHF 11.9 million (EUR 12.7 million)]. The original value of the portfolio of CHF agreements granted (the sum of tranches paid to customers), taking into account the exchange rate as at the date of disbursement of loan tranches, amounted to PLN 19.4 billion (EUR 4.6 billion) for 109 thousand loan agreements (Bank Millennium portfolio: PLN 18.3 billion (EUR 4.3 billion) for 103.8 thousand loans agreements and former Euro Bank portfolio: PLN 1.1 billion (EUR 0.3 billion) for 5.2 thousand loan agreements). Out of 18,950 Bank Millennium's loan agreements in ongoing individual cases 450 are also part of class action. From the total number of individual litigations against the Bank approximately 4,400 or 23% were submitted by borrowers that had already naturally or early fully repaid the loan or were converted to Polish zloty at the moment of submission. Approximately another 1,000 cases correspond to loans that were fully repaid during the proceedings (as court proceedings are lengthy).

The claims formulated by the clients in individual proceedings primarily concern the declaration of invalidity of the contract and payment for reimbursement of paid principal and interest instalments as undue performance, due to the abusive nature of indexation clauses, or maintenance of the agreement in PLN with interest rate indexed to CHF Libor.

In addition, Bank Millennium is a party to the group proceedings (class action) subject matter of which is to determine the Bank's liability towards the group members based on unjust enrichment (undue benefit) ground in connection with the foreign currency mortgage loans concluded. It is not a payment dispute. The judgment in these proceedings will not directly grant any amounts to the group members. The number of credit agreements currently covered by these proceedings is 1,517. Out of 1,517 loan agreements in class action 450 are also part of ongoing individual cases, 44 concluded settlements and 61 received final verdicts (invalidation of loan agreement). On 24 May 2022 the court issued a judgment on the merits, dismissing the claim in full. On 13 December 2022 the claimant filed an appeal against the judgment of 24 May 2022. On 25 June 2024 an appeal hearing was held, at which the Bank filed a motion to amend the composition of the group and exclude those group members who had entered into an amicable settlement. The court required the plaintiffs' attorneys to take a written position on the current composition of the group. On 31 January 2025, and then on 25 March 2025, 8 May 2025, 6 June 2025, 30 July 2025, 1 September 2025 and 6 October 2025, the court issued orders setting aside the judgment and discontinuing the proceedings from the persons who entered into amicable settlements. Based on these orders, the number of credit agreements covered by the class action dropped from 3,273 to 1,517.

Until the end of 2019, 1,980 individual claims were filed against Bank Millennium (in addition, 235 against former Euro Bank), in 2020 the number increased by 3,002 (265), in 2021 the number increased by 6,152 (421), in 2022 the number increased by 5,753 (407), in 2023 the number increased by 6,863 (645), in 2024 the number increased by 5,836 (655), while in the first three quarters of 2025 the number increased by 3,014 (356).

Based on ZBP (the Polish Banking Association) data gathered from all banks having FX mortgage loans, vast majority of disputes were finally resolved against the banks. As far as Bank Millennium (including the former Euro Bank portfolio) is concerned, from 2015 until the end of the third quarter of 2025, 14,613 cases were finally resolved (14,485 in claims submitted by clients against the Bank and 128 in claims submitted by the Bank against clients i.e. debt collection cases) out of which 4,631 were settlements, 121 were remissions, 83 rulings were favourable for the Bank and 9,778 were unfavourable including both invalidation of loan agreements as well as conversions into PLN+LIBOR. Bank Millennium undertakes proper legal actions in order to secure repayment of initially disbursed capital of the loan.

The outstanding gross balance of the loan agreements under individual court cases and class action against Bank Millennium (including the former Euro Bank portfolio) on 30 September 2025 was CHF 945 million (EUR 1,011.3 million) [of which the outstanding amount of the loan agreements under the class action proceeding was CHF 66 million (EUR 70.6 million)].

In the three quarters of the year 2025, Bank Millennium created PLN 1,314 million (EUR 310.4 million) of provisions for Bank Millennium originated portfolio and PLN 189.2 million (EUR 44.7 million) for the former Euro Bank originated portfolio. The balance sheet value of provisions for the Bank Millennium's portfolio at the end of September 2025 was PLN 6,968.3 million (EUR 1,634.6 million), and for the former Euro Bank portfolio, PLN 837.6 million (EUR 196.5 million).

The methodology developed by Bank Millennium of calculating provisions for legal risk involved with indexed loans is based on the following main parameters resulting from historical observations or expert assumptions:

- (1) the number of ongoing cases (including class action agreements);
- (2) the number of potential future court cases, the Bank monitors customer behaviours, analyses their willingness to sue the Bank, including due to economic factors and applies the following assumptions:
 - a. regarding active loans (i.e., loans with an outstanding balance), the Bank estimates that approximately 2.6 thousand will neither sign an out-of-court settlement nor decide to file a lawsuit;
 - b. regarding loans already fully repaid or converted to polish zloty, the Bank attributes a much lower probability of becoming the subject of a court case, Bank anticipates that approximately 1.8 thousand of the roughly 35,8 thousand repaid loans - those with the strong economic rationale for initiating legal proceedings against the Bank and which were not previously subject to a settlement - may result in future litigation initiated by the borrowers;
- (3) estimates involved with amicable settlements with clients, concluded in court or out of court:
 - a. the Bank assumes a 12% probability of success in concluding a settlement as part of negotiations conducted with clients in the course of court proceedings;
 - b. negotiations are conducted on a case-by-case basis and can be stopped at any time by the Bank;
 - c. due to significant negotiation efforts already made in the past, the probability of success in these negotiations in the future is decreasing, and at the same time most customers have already contacted the Bank regarding the possible conversion of loans into PLN.

Bank Millennium is open to negotiate case by case conditions for early repayment or conversion of loans to PLN. As a result of these negotiations, the number of active FX mortgage loans originated by Bank Millennium decreased by 29,274. At the end of the first three quarters of 2025, Bank Millennium had 17,779 active FX mortgage loans.

In terms of the Consolidated Income Statement, these costs are reflected in the following items:

Item	note	30 September 2025		30 September 2024	
		thousand PLN	thousand EUR	thousand PLN	thousand EUR
Results on modification	10	10,584	2,500	83,854	19,485
Other operating income/(expenses)	6	33,864	7,999	101,668	23,624
Foreign exchange gains/(losses)	5	22,339	5,277	288,611	67,062
Charge of other provisions	14	1,503,209	355,082	1,656,390	384,883
Total costs		1,569,996	370,858	2,130,523	495,054

Legal risk from former Euro Bank portfolio is fully covered by Indemnity Agreement with Société Générale S.A.

On 8 December 2020, Mr. Jacek Jastrzębski, the Chairman of the Polish Financial Supervision Authority ('PFSA') proposed a 'sector' solution to address the sector risks related to FX mortgages. The solution would consist in offering banks' clients a voluntary possibility of concluding arrangements based on which a client would settle a CHF Mortgage Loan as if it was a PLN loan bearing interest at an appropriate WIBOR rate increased by the margin historically employed for such loans. Bank Millennium in practice has been using elements of the proposal of above system solution on many individual negotiations with FX mortgage borrowers, including in the course of court proceedings.

Due to the circumstances stemming from the CJEU which excludes demanding by the Bank amounts exceeding the return of disbursed capital, the possibility of successful implementation of a general offer of KNF solution is low.

It can reasonably be assumed that the legal issues relating to foreign currency mortgage loans will be further examined by the domestic courts and the European Court of Justice which could potentially result in the further interpretations, that are relevant for the assessing of the risks associated with proceedings.

The issues related to the statute of limitations for the Bank Millennium's and the customer's restitutionary claims following the invalidation of a loan agreement remain an area that may be subject to further analysis in the jurisprudence of Polish courts. Legal interpretations in this subject may have an impact for the amount of provisions in the future.

There is a need for constant analysis of these matters. Bank Millennium will have to regularly review and may need to continue to create additional provisions for FX mortgage legal risk, taking into consideration not only the above mentioned developments, but also the negative verdicts in the courts regarding FX mortgage loans and important parameters, such as the number of new customer claims, including those relating to repaid loan agreements.

On 2 October 2025, the Council of Ministers adopted a draft act on special solutions for the examination of cases concerning loan agreements denominated or indexed to the Swiss franc and referred it to the Parliament. The first reading of the draft act took place on 16 October 2025. The draft was referred for further parliamentary work.

The bill aims to create new regulations enabling courts to consider Swiss franc cases faster and more effectively. Its primary task is to relieve the judiciary, and thus increase the efficiency of the justice system and speed up the examination of Swiss franc cases.

At present, the Bank Millennium is unable to estimate the impact of the ongoing legislative work on the Bank's Financial Statements, but it does not alter the Bank's strategic approach, which remains focused on the amicable resolution of disputes with clients through the conclusion of settlement agreements.

The Court of Justice of the European Union and the Polish Supreme Court rulings relevant to risk assessment

Jurisprudence of the Court of Justice of the European Union

On 3 October 2019, the Court of Justice of the European Union (the CJEU) issued the judgment in Case C-260/18 in connection with the preliminary questions formulated by the District Court of Warsaw in the case against Raiffeisen Bank International AG. The judgment of the CJEU, as regards the interpretation of European Union law made therein, is binding on domestic courts. The judgment in question interpreted Article 6 of Directive 93/13. In the light of the subject matter judgment the said provision must be interpreted in such a way that:

- (i) the national court may invalidate a credit agreement if the removal of unfair terms detected in this agreement would alter the nature of the main subject-matter of the contract;
- (ii) the effects for the consumer's situation resulting from the cancellation of the contract must be assessed in the light of the circumstances existing or foreseeable at the time when the dispute arose and the will of the consumer is decisive as to whether he wishes to maintain the contract;
- (iii) Article 6 of the Directive precludes the filling-in of gaps in the contract caused by the removal of unfair terms from the contract solely on the basis of national legislation of a general nature or established customs;
- (iv) Article 6 of the Directive precludes the maintenance of unfair terms in the contract if the consumer has not consented to the maintenance of such terms. It can be noticed the CJEU found doubtful the possibility of a credit agreement being performed further in PLN while keeping interest calculated according to LIBOR.

The CJEU judgment concerns only the situation where the national court has previously found the contract term to be abusive. It is the exclusive competence of the national courts to assess, in the course of judicial proceedings, whether a particular contract term can be regarded as abusive in the circumstances of the case.

On 29 April 2021, the CJEU issued the judgement in the case C-19/20 in connection with the preliminary questions formulated by the District Court in Gdańsk in the case against of ex-BPH S.A., the CJEU said that:

- (i) it is for the national court to find that a term in a contract is unfair, even if it has been contractually amended by those parties. Such a finding leads to the restoration of the situation that the consumer would have been in in the absence of the term found to be unfair, except where the consumer, by means of amendment of the unfair term, has waived such restoration by free and informed consent. However, it does not follow from Council Directive 93/13 that a finding that the original term is unfair would, in principle, lead to annulment of the contract, since the amendment of that term made it possible to restore the balance between the obligations and rights of those parties arising under the contract and to remove the defect which vitiated it;
- (ii) the national court may remove only the unfair element of a term in a contract concluded between a seller or supplier and a consumer where the deterrent objective pursued by Council Directive 93/13 is ensured by national legislative provisions governing the use of that term, provided that that element consists of a separate contractual obligation, capable of being subject to an individual examination of its unfair nature. At the same time, provisions of the Directive preclude the referring court from removing only the unfair element of a term in a contract concluded between a seller or supplier and a consumer where such removal would amount to revising the content of that term by altering its substance;
- (iii) the consequences of a judicial finding that a term if a contract concluded between a seller or supplier and a consumer is unfair are covered by national law and the question of continuity of the contract should be assessed by the national court of its own motion in accordance with an objective approach on the basis of those provisions;
- (iv) the national court, finding that a term in a contract concluded between a seller or supplier and a consumer is unfair, shall inform the consumer, in the context of the national procedural rules after both parties have been heard, of the legal consequences entailed by annulment of the contract, irrespective of whether the consumer is represented by a professional representative.

On 18 November 2021, the Court of Justice of the European Union (CJEU) issued a judgment in case C-212/20 in connection with questions submitted by the District Court for Warsaw Wola in Warsaw in the case against Raiffeisen Bank International AG. The CJEU stated that:

(i) the content of the clause of the loan agreement concluded between the entrepreneur and the consumer fixing the purchase and sale price of the foreign currency to which the loan is indexed should, on the basis of clear and comprehensible criteria, enable the consumer who is reasonably well informed and sufficiently observant and rational to understand how the exchange rate of the foreign currency used to calculate the amount of the loan instalments is determined, so that the consumer is able to determine himself at any time the exchange rate used by the entrepreneur;

(ii) a national court which has found that a term of the agreement concluded between an entrepreneur and a consumer is unfair cannot interpret that term in order to mitigate its unfairness, even if such an interpretation would correspond to the common will of the parties.

On 10 June 2021, the Court of Justice of the European Union (CJEU) issued an order in case C-198/20 in connection with questions submitted by the District Court for Warsaw Wola in Warsaw in the case against Santander Bank Polska SA. The CJEU stated that the protection provided for in Council Directive 93/13/EEC is granted to all consumers, not just those who can be considered to be 'duly informed and reasonably observant and circumspect average consumer'.

On 8 September 2022, the Court of Justice of the European Union (CJEU) issued a judgment in joined cases C-80/21, C-81/21, C-82/21 in connection with questions submitted by the District Court for Warsaw Śródmieście in Warsaw in cases against Deutsche Bank SA and mBank SA. The CJEU stated that:

(i) a national court may find that the parts of a contractual term of the agreement concluded between a consumer and an entrepreneur which render it unfair are unfair, if such a deletion would not amount to a change in the content of that term that affects its substance, which is for the referring court to verify;

(ii) a national court cannot, after annulling an unfair term contained in an agreement concluded between a consumer and an entrepreneur which does not render the agreement invalid in its entirety, replace that term with a supplementary provision of the national law;

(iii) a national court may not, after having declared invalid an unfair term contained in an agreement concluded between a consumer and an entrepreneur which entails the invalidity of that agreement in its entirety, replace the contractual term which has been declared invalid either by interpretation of the parties' declaration of intent in order to avoid the cancellation of that agreement or by a provision of national law of a supplementary nature, even if the consumer has been informed of the effects of the invalidity of that agreement, and accepted them;

(iv) the ten-year limitation period for a consumer's claim seeking reimbursement of sums unduly paid to the entrepreneur in performance of an unfair term of a loan agreement does not start to run on the date of each performance made by the consumer if the consumer was not able on that date to assess on his own the unfairness of the contractual term or if he had not become aware of the unfair nature of that term and without taking into account the circumstances that the agreement provided for a repayment period – in this case thirty years – well in excess of the ten-year statutory limitation period.

On 16 March 2023, the Court of Justice of the European Union issued a judgment in a case registered under case number C-6/22, following preliminary questions submitted by the District Court for Warsaw-Wola in a case against the former Getin Noble Bank S.A. In the judgment, the CJEU ruled that:

(i) in the event that a contract concluded between a consumer and a seller or supplier is declared invalid because one of its terms is unfair, it is for the Member States, by means of their national law, to make provision for the effects of that invalidation, in compliance with the protection granted to the consumer by that directive, in particular, by ensuring the restoration of the legal and factual situation that he or she would have been in if that unfair term had not existed.

(ii) a national court is not allowed:

a. to examine of its own motion, without any prerogative conferred on it by national law in that regard, the financial situation of a consumer who has sought the invalidation of the contract between him or her and a seller or supplier on account of the presence of an unfair term without which the contract cannot legally continue to exist, even if that invalidation is liable to expose the consumer to particularly unfavourable consequences and,

b. to refuse to declare that invalidation where the consumer has expressly sought it, after being objectively and exhaustively informed of the legal consequences and the particularly unfavourable financial consequences which it may have for him or her.

(iii) a national court is not allowed, after it has found that a term in a contract concluded between a seller or supplier and a consumer is unfair, to fill gaps resulting from the removal of the unfair term contained therein by the application of a provision of national law which cannot be characterised as a supplementary provision. However, it is for the national court, taking account of its domestic law as a whole, to take all the measures necessary to protect the consumer from the particularly unfavourable consequences which annulment of the contract might entail for him or her.

On 8 June 2023, the Court of Justice of the European Union (CJEU) issued a judgment in a case registered under case number C-570/21, following preliminary questions submitted by the District Court in Warsaw in a case against the former Getin Noble Bank S.A. In the judgment, the CJEU ruled that:

(i) provisions of Council Directive 93/13 must be interpreted as meaning that the concept of ‘consumer’, within the meaning of that provision, covers a person who has concluded a loan contract intended for a purpose in part within and in part outside his or her trade, business or profession, together with a joint-borrower who did not act within his or her trade, business or profession, where the trade, business or professional purpose is so limited as not to be predominant in the overall context of that contract.

(ii) provisions of Directive 93/13 must be interpreted as meaning that in order to determine whether a person falls within the concept of ‘consumer’, within the meaning of that provision, and, specifically, whether the trade, business or professional purpose of a loan contract concluded by that person is so limited as not to be predominant in the overall context of that contract, the referring court is required to take into consideration all the relevant circumstances surrounding that contract, both quantitative and qualitative, such as, in particular, the distribution of the borrowed capital between, on the one hand, a trade, business or profession and, on the other hand, a non-professional activity and, where there are several borrowers, the fact that only one of them is pursuing a professional purpose or that the lender made the grant of credit intended for consumer purposes conditional on a partial allocation of the amount borrowed to the repayment of debts connected with a trade, business or profession.

On 15 June 2023, the Court of Justice of the European Union (CJEU) issued a judgment in a case registered under case number C-287/22, following preliminary questions submitted by the District Court in Warsaw in a case against the former Getin Noble Bank S.A. In the judgment, the CJEU ruled that provisions of the Directive 93/13 must be interpreted as precluding national case-law according to which a national court may dismiss an application for the grant of interim measures lodged by a consumer seeking the suspension, pending a final decision on the invalidity of the loan agreement concluded by that consumer on the ground that that loan agreement contains unfair terms, of the payment of the monthly instalments due under that loan agreement, where the grant of those interim measures is necessary to ensure the full effectiveness of that decision.

On 15 June 2023, the CJEU issued a judgment in a case registered under case number C-520/21, following preliminary questions submitted by the District Court in Warsaw in a case against Bank Millennium, in which indicated that Directive 93/13 does not expressly regulate the consequences of invalidity of a contract concluded between a credit institution and a consumer after the removal of unfair terms contained therein. The CJEU stated that:

(i) the provisions of the Directive 93/13 do not preclude a judicial interpretation of national law, according to which the consumer has the right to demand compensation from the credit institution beyond the reimbursement of monthly instalments and costs paid for the performance of this contract and the payment of statutory default interest from the date of the request for payment provided that the objectives of Directive 93/13 and the principle of proportionality are respected.

(ii) the provisions of Directive 93/13 preclude the judicial interpretation of national law, according to which a credit institution has the right to demand compensation from the consumer that goes beyond the return of the capital paid for the performance of this contract and beyond the payment of statutory default interest from the date of the request for payment.

On 21 September 2023, the CJEU issued a judgement in a case registered under case number C-139/22, following preliminary questions submitted by the District Court in Warsaw in a case against mBank. The CJEU stated that:

- (i) provisions of the Directive 93/13 must be interpreted as not precluding a contractual term which has not been individually negotiated from being regarded as unfair by the national authorities concerned merely by virtue of the fact that its content is equivalent to that of a standard contract term entered in the national register of standard business terms held to be unlawful;
- (ii) the contractual term which, because of the circumstances for the performance of certain obligations of the consumer concerned provided for in that term, must be regarded as unfair, may not cease to be considered unfair on account of another term of that contract which provides for the possibility for that consumer to perform those obligations under different circumstances;
- (iii) a seller or supplier is obliged to inform the consumer concerned of the essential characteristics of the contract concluded with that seller or supplier and the risks associated with that contract, even though that consumer is its employee and has relevant knowledge in the field of the contract.

On 7 December 2023, the CJEU issued the judgement in the case C-140/22 in connection with the preliminary questions formulated by the District Court in Warsaw in the case against of mBank S.A. The Court stated that provisions of the Directive 93/13 must be interpreted as meaning that, in the context of the cancellation, in its entirety, of a mortgage loan agreement concluded with a consumer by a banking institution on the ground that that agreement contains an unfair term without which it cannot continue in existence:

- (i) they preclude the judicial interpretation of national law according to which the exercise of the rights which that consumer draws from that directive is conditional on the lodging, by that consumer, before a court, of a declaration by which he or she states, first, not to consent to that unfair term remaining effective, secondly, to be aware of the fact that the nullity of that term entails the cancellation of that agreement and, moreover, of the consequences of that cancellation and, thirdly, to consent to the cancellation of that agreement;
- (ii) they preclude the compensation sought by the consumer concerned in respect of the restitution of the sums paid by him or her in the performance of the agreement at issue being reduced by the equivalent of the interest which that banking institution would have received if that agreement had remained in force.

The Court of Justice of European Union by an order of 11 December 2023, closed the case registered under case number C-756/22 initiated by the District Court in Warsaw in the case brought by Bank Millennium and ruled that the provisions of Directive 93/13 must be interpreted as meaning that, in the context of declaring a mortgage loan agreement concluded with a consumer by a banking institution to be invalid in its entirety on the grounds that, that the contract contains unfair terms without which it cannot be continued, they preclude a judicial interpretation of the law of a Member State according to which that institution is entitled to recover from that consumer amounts other than the capital paid in performance of that contract and statutory interest for delay from the time of the demand for payment.

On 14 December 2023, the CJEU issued the judgement in the case C-28/22 in connection with the preliminary questions referred by the District Court in Warsaw in the case of ex-Getin Noble Bank S.A. The Court stated that:

- (i) provisions of Directive 93/13 read in the light of the principle of effectiveness must be interpreted as precluding a judicial interpretation of national law according to which, following the cancellation of a mortgage loan agreement concluded with a consumer by a seller or supplier, on account of unfair terms contained in that agreement, the limitation period for the claims of that seller or supplier stemming from the nullity of that agreement starts to run only as from the date on which the agreement becomes definitively unenforceable, whereas the limitation period for the claims of that consumer stemming from the nullity of that agreement begins to run as from the day on which the consumer became aware, or should reasonably have become aware, of the unfair nature of the term entailing such nullity;

(ii) provisions of the Directive 93/13 must be interpreted as not precluding a judicial interpretation of national law according to which it is not for a seller or supplier who has concluded a mortgage loan agreement with a consumer to ascertain whether the consumer is aware of the consequences of the removal of the unfair terms contained in that agreement or of that agreement being no longer capable of continuing in existence if those terms were removed;

(iii) provisions of the Directive 93/13, read in the light of the principle of effectiveness, must be interpreted as precluding a judicial interpretation of national law according to which, where a mortgage loan agreement concluded with a consumer by a seller or supplier is no longer capable of continuing in existence after the unfair terms in that agreement have been removed, that seller or supplier may rely on a right of retention which allows him or her to make the restitution of the sums which it has received from that consumer conditional on that consumer making an offer to repay the sums which he or she has himself or herself received from that seller or supplier or to provide a security for the repayment of those sums, where the exercise by that seller or supplier of that right of retention entails the loss, for that consumer, of the right to obtain default interest as from the expiry of the time limit set for performance by the seller or supplier concerned, following receipt by that seller or supplier of a request to repay the sums he or she had been paid in performance of that agreement.

The Court of Justice of the European Union by an order of 15 January 2024, closed the case registered under case number C-488/23 following a question from the District Court of Warsaw, indicating that the right of a financial institution to demand the valorization of the disbursed capital after a loan agreement has been declared invalid was excluded in the judgment of 15 June 2023 issued in case C-520/21.

On 18 January 2024, the CJEU issued the judgement in the case C-531/22 in connection with the preliminary questions referred by the District Court in Warsaw in the case of ex-Getin Noble Bank S.A. The Court stated that:

(i) the provisions of Directive 93/13 preclude national legislation which provides that a national court may not examine of its own motion the potentially unfair nature of the terms contained in a contract and draw the consequences thereof, where it is supervising enforcement proceedings carried out on the basis of a final decision to issue an order for payment which is subject to *res judicata*:

- a. if the regulations do not provide for such an examination at the stage of issuing a payment order, or
- b. if such examination is provided for only at the stage of opposition to the order for payment in question, provided that there is a significant risk that the consumer in question will not file the required opposition either because the time limit specified for this purpose is very short, or because of the cost of the proceedings before the court in relation to the amount of the disputed debt, or because the national legislation does not provide for the obligation to provide that consumer with all the information necessary for him to establish the extent of his rights;
- c. (ii) the provisions of Directive 93/13 do not preclude national case law according to which the entry of a term of a contract in a national register of prohibited clauses has the effect of declaring that term unfair in any proceedings involving a consumer, including against a trader other than the one against whom proceedings for the entry of the said term in that national register were pending, and where that term does not have the same wording as the term entered in the said register, but has the same meaning and has the same effect with respect to the consumer in question.

By decision of 3 May 2024, the Court of Justice of the European Union closed the case registered under case no. C-348/23 following a question from the District Court in Warsaw, indicating that they preclude the recognition that the legal effects related to the declaration of invalidity of the contract are conditional on the fulfilment by the consumer of the condition precedent for that consumer to make a declaration before the national court, that it does not agree to maintain the contractual term in force and that it is aware that the invalidity of the said term entails the annulment of the loan agreement and its effects and that it consents to the annulment of the agreement.

By decision of 8 May 2024, the Court of Justice of the European Union closed the case registered under case no. C-424/22 as a result of a question from the Regional Court in Kraków, indicating that they preclude the application by a financial institution of the right of retention which makes the consumer's receipt of the amounts awarded to him by the court conditional on the consumer's simultaneous offer of reimbursement or security for the return of the entire benefit received from that financial institution.

On 19 June 2025, the Court of Justice of the European Union issued a judgment in Case C-396/24 following preliminary questions referred by the District Court in Krakow in the case. The Court held that:

- (i) Article 7(1) of Council Directive 93/13/EEC of 5 April 1993 on unfair terms in consumer contracts must be interpreted as meaning that: It precludes national case-law according to which, where a term of a loan agreement found to be unfair leads to the invalidity of that agreement, the trader is entitled to demand from the consumer the return of the entire nominal amount of the loan granted, regardless of the amounts repaid by the consumer under that agreement and regardless of the remaining amount to be repaid.
- (ii) Article 7(1) of Directive 93/13 must be interpreted as meaning that: It precludes national provisions under which, in the event of the consumer acknowledging the trader's claim for the return of amounts paid under a loan agreement found to be invalid due to an unfair term contained therein, the court hearing the case is required ex officio to give the judgment upholding that claim immediate enforceability, unless national law allows that court to take all necessary measures to protect the consumer from particularly harmful consequences that may result from giving such enforceability to that judgment.

Jurisprudence of the Polish Supreme Court

On 7 May 2021, the Supreme Court composed of 7 judges of the Supreme Court, issued a resolution for which the meaning of legal principle has been granted, stating that:

1. An abusive contractual clause (art. 385(1) § 1 of the Civil Code), by force of the law itself, is ineffective to the benefit of the consumer who may consequently give conscious and free consent to this clause and thus restore its effectiveness retroactively.
2. If without the ineffective clause the loan agreement cannot bind, the consumer and the lender shall be eligible for separate claims for return of monetary performances made in exercising this agreement (art. 410 § 1 in relation to art. 405 of the Civil Code). The lender may demand return of the performance from the moment the loan agreement becomes permanently ineffective.

On 28 April 2022 the Supreme Court issued a resolution (III CZP 40/22) in which it indicated that in disputes with consumers, the provision of Article 358(1) of the Civil Code is a special provision to Article 353(1) of the Civil Code, which means that if the prerequisites for the application of both provisions exist, the court should apply the special provision and declare the contractual provision permanently ineffective, rather than invalid. This decision of the Supreme Court should be perceived as significantly limiting the risk of the bank's claims for return of capital being time-barred.

The effect of the Supreme Court's resolution of 7 May 2021 is that the bank is entitled to a refund of the cash benefit provided by the bank in performance of a permanently ineffective contract. Taking into account the uncertainty as to the starting point of the limitation period for the bank's claims, Bank Millennium, in order to protect its interests, files lawsuits for payment against borrowers in a court dispute with the Bank and in other circumstances where such risk may exist. The Bank's demand consists of a claim for return of the capital made available to the borrower under the contract. By 30 September 2025 Bank Millennium filed 16,062 lawsuits against the borrowers.

On 25 April 2024, a session of the Civil Chamber of the Supreme Court was held to answer questions formulated by the First President of the Supreme Court, published on 29 January 2021, on key issues related to foreign currency mortgage loan agreements. The Supreme Court, composed of the entire Civil Chamber, adopted a resolution having the force of a legal principle, in which it stated that:

- a. When finding that a provision of an indexed or denominated credit agreement relating to the manner of determining the foreign currency exchange rate constitutes an unfair contractual provision and is not binding, then in currently existing legal situation it cannot be stated that such a provision could be replaced by another formula of defining the foreign currency exchange rate resulting from law or custom.
- b. In case of impossibility to determine the foreign currency exchange rate binding the parties in the indexed or denominated loan agreement, the agreement is not binding also in the remaining scope.

- c. If, in the performance of a credit agreement which is not binding due to the unfair nature of its provisions, the bank has disbursed to the borrower all or part of the amount of the credit and the borrower has made repayments of the credit, independent claims for repayment of the undue performance shall arise in favour of each party.
- d. If a credit agreement is not binding due to the unfair nature of its provisions, the statute of limitations of the bank's claim for repayment of amounts disbursed under the credit shall, as a rule, start to run from the day following the day on which the borrower challenges being bound by the provisions of agreement.
- e. If a credit agreement is not binding due to the unfair nature of its provisions, there shall be no legal basis for any party to claim interest or other remuneration because of using party's pecuniary means during the period from the provision of undue benefit until the delay in the return of this benefit.

On 19 June 2024, the Supreme Court issued a resolution by a panel of 7 Supreme Court judges (III CZP 31/23) stating that:

The right of retention (Article 496 of the Civil Code) does not apply to the party that can set off its claim against the claim of the other party.

On 28 February 2025, the Supreme Court issued a resolution of 7 judges of the Supreme Court (III CZP 126/22), in which it stated that:

(i) A bank loan agreement (Article 69(1) of the Banking Law Act of 29 August 1997) is a mutual agreement within the meaning of Article 487 § 2 of the Civil Code.

On 5 March 2025 the Supreme Court issued a resolution by a panel of 7 Supreme Court judges (III CZP 37/24), in which it stated that:

(i) In the event of a claim for repayment from a bank of a consideration fulfilled on the basis of a credit agreement which has proved to be invalid, the bank is not entitled to the right of retention under Article 496 in connection with Article 497 of the Civil Code.

On 15 May 2025, the Supreme Court issued a resolution by a panel of 7 Supreme Court judges (III CZP 22/24), in which it indicated that:

(i) Under the legal state in force until 30 June 2022, a request for a settlement attempt interrupted the limitation period of the claim, unless the circumstances of making this action indicate that it was not undertaken directly for the purpose of pursuing or determining, or satisfying or securing the claim (Article 123 § 1 point 1 of the Civil Code).

Due to the CJEU jurisprudence interpreting the causes and effects of invalidity of foreign currency mortgage loan agreements as well as above indicated resolution of the Civil Chamber of the Supreme Court, the area of interpretation of regulations by Polish courts in this respect appears to be limited. However, further jurisprudential practice of the Polish courts will play certain role in practical realisation of the CJEU's and the Supreme Court's guidance.

54. List of subsidiaries and associates of Banco Comercial Português Group

SUBSIDIARIES

As at 30 September 2025, the Group's subsidiaries included in the consolidated accounts using the full consolidation method were as follows:

Subsidiaries	Head office	Share capital	Currency	Sector of activity	Group		Bank
					% economic interests	% effective held	% direct held
Banco ActivoBank, S.A.	Lisbon	127,600,000	EUR	Banking	100 %	100 %	100 %
Bank Millennium, S.A.	Warsaw	1,213,116,777	PLN	Banking	50.1 %	50.1 %	50.1 %
Millennium Bank Hipoteczny S.A.	Warsaw	163,000,000	PLN	Banking	100 %	50.1 %	—
BCP África, S.G.P.S., Lda.	Funchal	214,223,800	EUR	Holding company	100 %	100 %	100 %
BIM - Banco Internacional de Moçambique, S.A.	Maputo	4,500,000,000	MZN	Banking	66.7 %	66.7 %	—
M Representações Ltda.	São Paulo	88,202,444	BRL	Financial Services	100 %	100 %	100 %
Millennium bcp Participações, S.G.P.S., Sociedade Unipessoal, Lda.	Funchal	25,000	EUR	Holding company	100 %	100 %	100 %
Interfundos - Sociedade Gestora de Organismos de Investimento Coletivo, S.A.	Oeiras	1,500,000	EUR	Real estate investment fund management	100 %	100 %	100 %
Monumental Residence - Sociedade de investimento coletivo imobiliária fechada, S.A.	Oeiras	31,900,000	EUR	Real-estate management	100 %	100 %	100 %
Millennium bcp - Prestação de Serviços, A.C.E.	Lisbon	331,750	EUR	Services	98.6 %	97.7 %	93.2 %
Millennium bcp Teleserviços - Serviços de Comércio Electrónico, S.A.	Lisbon	50,004	EUR	E-commerce	100 %	100 %	100 %
Imoserit, S.A.	Oeiras	50,000	EUR	Real-estate company	100 %	100 %	100 %
Bichorro – Empreendimentos Turísticos e Imobiliários S.A.	Oeiras	2,150,000	EUR	Real-estate management	100 %	100 %	—
Finalgarve – Sociedade de Promoção Imobiliária Turística, S.A.	Oeiras	250,000	EUR	Real-estate management	100 %	100 %	—
Fiparso – Sociedade Imobiliária S.A	Oeiras	50,000	EUR	Real-estate company	100 %	100 %	—
Millennium Consulting S.A.	Warsaw	4,339,500	PLN	Consulting services	100 %	50.1 %	—
Millennium Goodie Sp.z.o.o.	Warsaw	500,000	PLN	Web portals	100 %	50.1 %	—
Millennium Leasing, Sp.z o.o.	Warsaw	48,195,000	PLN	Leasing	100 %	50.1 %	—
Millennium Service, Sp.z o.o.	Warsaw	1,000,000	PLN	Services	100 %	50.1 %	—
Millennium Telecommunication Services Sp. z o.o.	Warsaw	100,000	PLN	Brokerage services	100 %	50.1 %	—
Millennium TFI - Towarzystwo Funduszy Inwestycyjnych, S.A.	Warsaw	10,300,000	PLN	Investment fund management	100 %	50.1 %	—

In the first nine months of 2025, the Group liquidated the subsidiary BCP International B.V. and Piast Expert Sp. z o.o.

As at 30 September 2025, the investment funds included in the consolidated accounts using the full consolidation method, were as follows:

Investment funds	Head office	Share capital	Currency	Activity	Group		Bank
					% economic interests	% effective held	% direct held
Imosotto acumulação – Fundo de Investimento Imobiliário Fechado	Oeiras	102,385,157	EUR	Real-estate investment fund	100 %	100 %	100 %
Imorenda – Fundo de Investimento Imobiliário Fechado	Oeiras	85,156,715	EUR	Real-estate investment fund	100 %	100 %	100 %
Sand Capital - Fundo de Investimento Imobiliário Fechado	Oeiras	88,882,695	EUR	Real-estate investment fund	100 %	100 %	100 %
Fundial – Fundo de Investimento Imobiliário Fechado	Oeiras	17,340,985	EUR	Real-estate investment fund	100 %	100 %	100 %
Fundipar – Fundo de Investimento Imobiliário Fechado	Oeiras	1,546,726	EUR	Real-estate investment fund	100 %	100 %	100 %
Domus Capital– Fundo de Investimento Imobiliário Fechado	Oeiras	3,799,969	EUR	Real-estate investment fund	95.8 %	95.8 %	95.8 %
Predicapital – Fundo de Investimento Imobiliário Fechado (*)	Oeiras	88,951,500	EUR	Real-estate investment fund	60 %	60 %	60 %

(*) - Company classified as non-current assets held for sale.

The Group holds a securitization transaction regarding mortgage loans which was set through specifically created SPE. As referred in accounting policy 1 B, when the substance of the relationships with the SPEs indicates that the Group holds control of its activities, the SPE is fully consolidated, following the application of IFRS 10.

As at 30 September 2025, the Special Purpose Entity included in the consolidated accounts under the full consolidation method is as follows:

Special Purpose Entities	Head office	Share capital	Currency	Activity	Group		Bank
					% economic interests	% effective held	% direct held
Magellan Mortgages No.3 Limited	Dublin	40,000	EUR	Special Purpose Entities	82.4 %	82.4 %	82.4 %

ASSOCIATES

As at 30 September 2025, the Group's associates included in the consolidated accounts under the equity method are as follows:

Associates	Head office	Share capital	Currency	Activity	Group		Bank
					% economic interests	% effective held	% direct held
Banco Millennium Atlântico, S.A.	Luanda	53,821,603,000	AOA	Banking	22.7 %	22.5 %	—
Banque BCP, S.A.S.	Paris	215,892,336	EUR	Banking	18.9 %	18.9 %	18.9 %
Lubuskie Fabryki Mebli, S.A. (in liquidation)	Swiebodzin	524,552	PLN	Furniture manufacturer	50 %	25.1 %	—
Europa Millennium Financial Services sp. z o.o.	Warsaw	100,000	PLN	Services	20 %	10 %	—
SIBS, S.G.P.S., S.A.	Lisbon	24,642,300	EUR	Banking services	23.3 %	21.9 %	—
UNICRE - Instituição Financeira de Crédito, S.A.	Lisbon	10,000,000	EUR	Credit cards	32 %	32 %	0.5 %
Webspectator Corporation	Delaware	950	USD	Digital advertising services	25.1 %	25.1 %	25.1 %
TIICC S.A.R.L.	Luxembourg	12,500	EUR	Services	38.5 %	38.5 %	38.5 %
Nexponor - Sociedade de Investimento Coletivo Imobiliário Fechado, S.A. (in liquidation)	Lisbon	65,621,200	EUR	Real-estate management	20.7 %	20.7 %	20.7 %

As at 30 September 2025, the investment and venture capital funds included in the consolidated accounts under the equity method are as follows:

Investment and venture capital funds	Head office	Share capital	Currency	Activity	Group		Bank
					% economic interests	% effective held	% direct held
Fundo Turismo Algarve, FCR (*)	Lisbon	124,160,000	EUR	Venture capital fund	73.6 %	73.6 %	73.6 %
Fundo de Investimento imobiliário fechado Eurofundo (in liquidation)	Lisbon	9,452,000	EUR	Real-estate investment fund	35.1 %	35.1 %	35.1 %
Lusofundo - Fundo de Investimento imobiliário fechado (in liquidation)	Lisbon	34,518,110	EUR	Real-estate investment fund	42.5 %	42.5 %	42.5 %

(*) Since Banco Comercial Português, SA does not have control over the management of this fund, the equity method was applied in the Group's consolidated accounts.

As at 30 September 2025, the Group's associates in the insurance sector included in the consolidated accounts under the equity method were as follows:

Associates	Head office	Share capital	Currency	Activity	Group		Bank
					% economic interests	% effective held	% direct held
Millenniumbcpc Ageas Grupo Segurador, S.G.P.S., S.A.	Lisbon	50,002,375	EUR	Holding company	49 %	49 %	49 %
Ocidental - Companhia Portuguesa de Seguros de Vida, S.A.	Lisbon	22,375,000	EUR	Life insurance	49 %	49 %	—
Ageas - Sociedade Gestora de Fundos de Pensões, S.A.	Lisbon	1,200,000	EUR	Pension fund management	49 %	49 %	—
Fidelidade Moçambique - Companhia de Seguros S.A.	Maputo	295,000,000	MZN	Insurance	22 %	14.7 %	—

Some indicators of the main subsidiaries and associates are analysed as follows:

Subsidiaries and associates	30 September 2025			30 September 2024		
	Total Assets	Total Equity	Net income for the period	Total Assets	Total Equity	Net income for the period
	(Thousands of euros)					
Banco Comercial Português, S.A.	68,655,353	6,981,731	615,833	63,899,295	6,649,755	616,704
Banco ActivoBank, S.A.	4,972,114	324,055	34,190	4,179,532	280,105	27,223
Bank Millennium, S.A. (1)	35,874,557	2,066,086	202,024	31,665,321	1,785,455	127,032
BIM - Banco Internacional de Moçambique, S.A. (1)	2,756,400	492,788	25,424	2,821,745	507,014	63,609
BCP International B.V.	—	—	(15)	523,434	523,403	(532)
BCP Finance Bank, Ltd.	—	—	—	518,795	518,795	(536)
BCP África, S.G.P.S., Lda.	257,205	257,150	(20,722)	286,346	286,003	8,544
Millennium bcp Participações, S.G.P.S., Sociedade Unipessoal, Lda.	187,371	187,360	4,250	146,204	146,193	4,302
Interfundos - Sociedade Gestora de Organismos de Investimento Coletivo, S.A.	7,909	6,527	427	8,066	6,627	617
Millenniumbcpc Ageas Grupo Segurador, S.G.P.S., S.A. (1) (3)	8,656,578	494,807	52,579	8,295,122	477,209	51,286
Banco Millennium Atlântico, S.A. (2)	2,043,117	191,174	14,819	1,843,983	168,570	9,477
Banque BCP, S.A.S.	5,868,292	280,077	12,627	5,910,147	280,897	12,094

1) Consolidated accounts.

2) These indicators correspond to the statutory financial statements that do not include the effects of applying IAS 29.

3) The amounts of 30 September 2025 refer to the estimated financial statements.

55. Subsequent events

In addition to the aspects disclosed in the other notes and according to the accounting policy 1 Z, the events that occurred after the date of the financial statements and until the date of its approval, were as follows:

Banco Comercial Português, S.A. informed about minimum prudential requirements

On 3 November 2025, Banco Comercial Português, S.A. ("BCP" or "Bank") informed that, under the context of the Supervisory Review and Evaluation Process (SREP), it has been notified of the decision of the European Central Bank (ECB) regarding minimum prudential requirements to be fulfilled on a consolidated basis from 1 January 2026.

According to the information received, the Pillar 2 Requirement ("P2R") for BCP from 1 January 2026, is 2.15%, which represents a decrease of 10 bp, reflecting a more favourable assessment from the Supervisor on the Bank's global risk.

The decisions referred above establish the minimum own funds requirements determined based on the total value of risk-weighted assets (RWA):

BCP Consolidated	Capital requirements	Minimum Capital Requirements		
		of which:		
		Pillar 1	Pillar 2	Buffers
CET1	10.28%	4.50%	1.21%	4.57%
T1	12.18%	6.00%	1.61%	4.57%
Total	14.72%	8.00%	2.15%	4.57%

Buffers include the capital conservation buffer (2.5%), the buffer for other systemically important institutions (O-SII: 1.0%), Countercyclical Capital Buffer (CCyB: 0.80%; proforma in September 2025: weighted average of exposures by country by their respective countercyclical reserve, of which 0.75% for exposures in Portugal in accordance with Notice 7/2024 of the Bank of Portugal and 1% for exposures in Poland, recalculated quarterly) and the Sectoral Systemic Risk buffer of 0.27% (variable, corresponding to 4% on the amount of risk exposures on the retail portfolio of loans to individuals collateralized by residential properties located in Portugal, calculated in pursuant to paragraph 3 of article 92 of Regulation (EU) 575/2013, at the highest level of consolidation in Portugal, considering the applicable legal framework).

The estimated ratios as of 30 September 2025, on a consolidated basis, exceed the minimum required CET1, Tier 1 and total ratio by a wide margin, including all the reserves mentioned above, demonstrating the Bank's solid capitalization.

Banco Comercial Português, S.A. informed on the upgrade of credit ratings by Morningstar DBRS

On 1 October 2025, Banco Comercial Português, S.A. ("BCP" or "Bank") informed that Morningstar DBRS rating agency upgraded the Bank's deposits ratings from A(low) to A and the senior unsecured debt ratings from BBB(high) to A(low).

The upgrade to BCP's credit ratings by Morningstar DBRS's reflects that the Bank's asset quality has demonstrated sustained improvement, while BCP's profitability, internal capital generation, and solvency buffers remain strong.

According to Morningstar DBRS, the Bank has made ample progress in reducing nonperforming exposures (NPEs) in Portugal and in its international operations. Morningstar DBRS expects the favorable economic environment in Portugal to support the Bank's domestic operations and limit asset quality deterioration, and risk linked to legacy Swiss franc-denominated mortgages in Poland has diminished, partly because of large provisioning.

The trend on all credit ratings is Stable.

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Banco Comercial Português, S.A.

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