

# Policy (PL)

Reference	PL-ATL-21-00x	Date of publication	xx/12/2021	Version	01	
Owner	Investor Relations (IR)					

# Transparency and Information Disclosure Policy

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## **1. Introduction**

This Policy establishes the rules that must be observed by Banco Millennium Atlântico, S.A. (hereinafter "ATLANTICO") in terms of transparency, disclosure and updating of financial and institutional information, which shall be mandatorily published on its institutional website.

In this Policy, the following legal provisions that establish the rules applicable to ATLANTICO in the disclosure and updating of information were considered:

- <u>Notice no. 5/19 of 23 August</u> Accounting Standardization and Harmonization Process in the Angolan Banking Sector
- <u>Notice no. 01/2022 of 17 January</u> Corporate Governance Code of Financial Institutions.

#### 2. Scope and Impact

This Policy covers the disclosure of financial and institutional information of mandatory publication, in accordance with the applicable Law.

ATLANTICO shall guarantee the disclosure of complete, reliable, current, timely, consistent, and understandable information, to provide a comprehensive view of the strategy, risk profile, financial situation, and market behaviour to all its stakeholders, avoiding asymmetries in its access between shareholders, employees and the general public.

#### 3. Responsibility for Disclosure of Information

It is up to the Investor Relations (IR) to ensure, and to the Brand and Communication Department (DMC) to operationalize, the disclosure of mandatory financial and institutional information on the Bank's institutional website (<u>www.atlantico.ao</u>) and/or in other channels of mandatory publications, in accordance with Article 7 of <u>Notice no. 5/19 of 23 August</u> – Accounting Standardization and Harmonization Process in the Angolan Banking Sector, and Articles 7 and 25 of <u>Notice no. 01/2022 of 17 January</u> – Corporate Governance Code of Financial Institutions, as shown in the table below:



Information	Perimeter	Reference period	Publication deadline	Person responsible for preparing the information
Capital structure with identification of holders of qualifying holdings				SL
Corporate acts concerning relevant changes in global strategic objectives and in organic and functiona structures		*		SL
Quarterly trial balances	Individual Consolidated	Quarterly	Up to 45 days after the end of the respective quarter	DCT
Interim Report - Management report - Financial statements and accompanying notes - External auditor's opinion - Supervisory Board's opinion	Individual Consolidated	6 months period	Until September 30 <sup>th</sup>	IR
Annual Report and Accounts - Management report - Financial statements and accompanying notes - External auditor's opinion - Supervisory Board's opinion	Individual Consolidated	Annual	Until April 30 <sup>th</sup>	IR
Information on the members of governing bodies, including:				
Remuneration policy, explaining the global amounts paid by ATLANTICO to each governing body, as well as the process by which the policy is implemented and approved				SL
Qualifications and professional experience				SL
Identification of shares held in ATLANTICO				SL
Identification of positions in governing bodies of other companies, whether or not belonging to the Financial Group				SL
Categorization of members of the Management Body as executives or non-executives and as independent or non-independent	_			SL
Description of materially relevant risks for ATLANTICO, of the existing processes for their management and forecast of the evolution of associated risk factors	:	*		ROF
Corporate Governance Policies, namely ATLANTICO Code of Conduct Training Policy, providing for the annual number of training hours, detailed by nature of training, and identifying, in particular, those aimed at employees in risk-taking areas and those in control areas or functions				DGT
Policy for Identification and Mitigation of Conflicts of Interest Compliance Policy Related Party Transactions Policy	-			COF
Inregularities Reporting Policy Internal Control Policy Information Transparency and Disclosure Policy	-			DAU ROF COF DAU IR

\* This mandatory information shall be updated annually or whenever there are relevant changes.

Mandatory publication of financial and institutional information shall be available on the Bank's institutional website for a minimum period of 5 years.

#### 4. Approval, Disclosure, Term and Review

This policy is prepared by the IR and the competent body for approval is the Board of Directors.

This policy shall be communicated to ATLANTICO's employees, taking effect as of its publication and being revised and updated whenever deemed necessary.

## **Banco Millennium Atlântico**