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<i>Owner</i>	Audit Department (DAU)				

Irregularity Reporting Policy

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TITLE I - PURPOSE

This Policy aims to:

- (i) Incorporate and promote compliance with current legal and regulatory provisions and internal rules and procedures established by Bank Millennium Atlântico, SA ("hereinafter ATLANTICO"), applicable to the reporting of irregularities, in accordance with best practices, which a further contribution to the strengthening of the governance model;
- (ii) Establish the principles and competences for identification, analysis, registration and processing in accordance with the concept set out herein, in order to ensure the possibility of reporting irregularities that may arise from different situations;

TITLE II - LEGAL AND REGULATORY FRAMEWORK

Several legal provisions and internal regulations of ATLANTICO that establish rules and procedures for facilitating and safeguarding the reporting of irregularities were taken into cognizance in preparing this policy.

External Documents/Regulations:

Act Nr. 14/21 of May 19- Law on the General Regime of Financial Institutions

Act nr. 22/11 of 17 June - Law on the Protection of Personal Data

Notice Nr. 01/2022 of January 17- Corporate Governance Code of Banking Financial Institutions

TITLE III - SCOPE AND COVERAGE

This Policy sets out the principles, rules and duties for the communication, reception and treatment of reports of irregularities reported to the Bank, as well as the powers and responsibilities of the receiving body for their proper treatment.

The reporting of irregularities is the duty of the Bank's employees and of all persons subject to the internal Code of Conduct and Ethics, and is therefore applicable to all employees, management bodies, partners, consultants and service providers, as well

as, whenever possible, third parties who, at any time, act on behalf of and/or in the name of ATLANTICO, namely subcontracted entities. Irregularities may also be reported on all those described above.

The Bank has put in place an internal procedure, entitled "Analysis and Treatment of Complaints", to ensure a functional circuit for the treatment of complaints and to guarantee the confidentiality of the identity of complainants, the people being reported and third parties that may be involved in the complaint.

TITLE IV - GENERAL PRINCIPLES

ATLANTICO has a culture of liability and Compliance. It is against this background that the importance of this Policy on the Reporting Irregularities is understood, which will be used as an instrument of good corporate practice.

In addition to this Policy, ATLANTICO has an internal process for handling this type of communication and also includes this information in its Code of Conduct and Ethics, which is known to all employees and others designated therein.

TITLE V - CONCEPT OF IRREGULARITY AND ITS REPORTING

Irregularities are considered to be acts or omissions, intentional or negligent, consummated, which are being carried out or which, in the light of the available elements, can be anticipated as likely to be committed in terms of administration, accounting organization and internal supervision. Any irregularity that:

- a. Breaches the law, statutes, regulations or other extant external and internal regulations;
- b. Directly or indirectly inciting any form of asset damage to the Bank;
- c. Cause reputational damage to the Bank

The following situations are excluded from the scope of this Policy:

- a. Conflict of interest situations (which are resolved under the internal Conflict of Interest Policy);

- b. Complaints related to customer service and attendance to the general public (which are resolved under the Complaints Management and Handling Policy).

Irregularities may be reported through the Whistleblower Channel, by filling in the form available on the institutional website (www.atlantico.ao) or by telephone contact ([923 169 099](tel:923169099)) which is also on the institutional website and displayed at service points, and/or by other means of direct contact with the Audit Department (telephone or computer applications).

- a) If the person reporting so wishes, he may submit a written report, which may or may not be anonymous.

When the report is written, the Bank shall give feedback, that is, it must send an acknowledgment of receipt of such report, where the complainant is not anonymous.

In non-anonymous reports, the complainant shall ensure that he provides sufficient information in order for him to be identified and, where this is not possible, it shall be considered as an anonymous report.

When the report is not anonymous, the Audit Department shall respond within the period stipulated in the relevant procedure, after acknowledging receipt.

In such cases, ATLANTICO safeguards the confidentiality of the message, except when disclosure is ordered by legal proceedings.

The reports made cannot be the basis for the initiation of disciplinary, civil or criminal proceedings, which will only occur when such is found to be intentionally false. Furthermore, it shall not be used as a basis for the adoption of prohibited discriminatory practices, neither shall retaliatory, discrimination or other unfair treatment be meted out.

ATLANTICO guarantees the protection of the personal data of the person reporting and the reported person, regardless of the form of report and whether it is anonymous or not.

TITLE VI – COMPETENCES AND RESPONSIBILITIES OF THE AUDIT DIRECTORATE

The Audit Department is responsible for:

- a. Receiving the report, analyzing and identifying the existence of sufficient grounds to initiate the investigation, and may contact the whistleblower if the report is not anonymous;
- b. When the investigation is concluded, a report shall be put together containing its conclusions, due opinions and validations so that necessary measures are taken to correct the irregularity and possible sanction;
- c. If the Audit Department deems that there are no grounds to conduct an investigation, it must record such grounds in its own report and close the case.

All reported irregularities, regardless of form and treatment, are recorded in a specific database.

The Audit Department is responsible for managing the irregularities reporting system and shall report periodically, on a monthly basis (and whenever justified punctually), to the Audit and Internal Control Committee and to the Supervisory Board.

It is responsible for presenting the reports to the Executive Committee on a quarterly basis.

TITLE VII - DUTIES OF EMPLOYEES AND OTHER OBLIGATIONS

All those covered by this policy shall report any irregularity that has been consummated or that is considered as likely to occur and that they are aware of to the Audit Department.

Employees in the Control, Audit, Compliance and Risk departments have a special duty to report whenever they become aware of any irregularity.

Insufficiency of information or evidence does not preclude the duty of reporting whenever there are sufficient proven signs to carry out such report.

TITLE VIII - POWERS AND RESPONSIBILITIES OF THE SUPERVISORY BOARD

The Supervisory Board shall:

- a. Receive reports of irregularities submitted by shareholders, Bank employees and others;
- b. Record in writing all checks, inspections, complaints received and measures that have been taken and the outcome thereof.

TITLE IX - APPROVAL, DISCLOSURE AND ENTRY INTO FORCE

1. The Board of Directors shall approve this Policy.
2. This Policy shall be disclosed to ATLANTICO employees as well as to all identified persons mentioned herein and shall come into force on the date it is published. It shall be revised on an annual basis and whenever deemed necessary.

Millennium Atlantic Bank

Executive Committee