



CORPORATE SOCIAL RESPONSIBILITY POLICY

Date: 28-10-2022

Version: V1

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This document establishes Banco Primus S.A.'s Corporate Social Responsibility Policy.

1. Preamble

Corporate Social Responsibility establishes the idea that a business should operate in a manner as to improve their own wellbeing and the one of the community they operate in, not only by observing ethical and regulatory guidelines, but also by safeguarding and promoting the best interests of their stakeholders.

Responsible businesses are expected to be accountable and understand their impact, positive and/ or negative, on society and the environment. They should have in place processes to integrate social, environmental, ethical, human rights and consumer concerns into their business operations and core strategy.

This policy defines the guiding principles of Banco Primus regarding Corporate Social Responsibility. It is also complemented by Banco Primus's Code of Conduct.

All parties to whom this policy applies are individually ultimately responsible for compliance with it.

2. Mission, Vision and Values

Banco Primus is an international and multicultural bank that provides financing to individuals and companies. Our company is recognized for excellence and profitability, enhancing the sharing of best practices in creating benefits and opportunities for customers, partners, employees and shareholders, and as so, shall conduct its business with integrity, respecting the law, cultures, dignity and rights of individuals in all countries where it operates.

At Banco Primus, we believe that a sustainable world, both environmentally and socially will lead to better financial, environmental and social outcomes for us and the society we live in.

3. Objectives and Scope of this Policy

Banco Primus's Corporate Social Responsibility Policy focuses on creating the framework that will help Banco Primus to pursue its activity in a responsible manner, creating sustainable and added value for all its stakeholders, and the communities in which it operates, while preventing and mitigating the possible negative impacts derived from its activity.

This policy applies to all employees, executives, and members of the governing bodies of Banco Primus, who shall base their actions on the principles established in this directive and the Code of Conduct.

Banco Primus's Corporate Social Responsibility Policy aims to create value to all its stakeholders, and will base its actions on the following commitments:

To its customers:

Fair treatment and responsible banking

Banco Primus's customers should be only offered products/ services that match their economical situation and needs, as to avoid over indebtedness and to make sure that they understand the terms and conditions, the benefits, the risks and the costs of acquiring such products/ services.



Promotion of financial inclusion

Banco Primus will not discriminate, without justification, to whom its products are offered, and will promote financial inclusion.

Through the motto “One Client, One solution”, Banco Primus seeks to offer products and services that are simple, personalized and adapted to the needs and risk profile of its customers.

Banco Primus wants to promote financial inclusion by helping individuals and businesses access useful and affordable credit products and services that meet their needs, providing credit in a responsible and sustainable way.



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Sustainable and Responsible Offers or Solutions

Banco Primus will design products and services that will take into account the protection of the environment and the mitigation of climate change (e.g. through the financing of hybrid, electric and low emission vehicles).



To its employees:

Non-discrimination and Diversity

Banco Primus promotes diversity and non-discrimination, be it based on gender, race, religion, sexuality, nationality, age or any other discriminatory criteria, as well as promoting the existence of equal opportunities (e.g. reflected in our internal mobility processes, in our recruitment and career growth processes, among other) to all its employees.

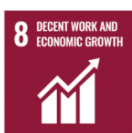


A great place to work

Banco Primus promotes the employment stability of its workers, enabling work flexibility and career growth while also giving its employees with a good work-life balance.

Banco Primus aims to provide its employees a secure and healthy workplace at all times, as described in our Safety, Hygiene and Health at Work directive/ instructions.

Banco Primus remunerates its workers with dignity and accordingly with their experience, their responsibilities and their functions (and once again, in a non-discrimination basis, be it based on gender, race, religion, sexuality, nationality, age or any other discriminatory criteria).



Workers Rights.

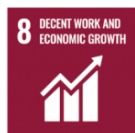
Banco Primus respects the fundamental labour standards contained in the local legislation of the countries where it pursues its activity as well as the International Labour Organization's fundamental conventions.



To its business partners:

Promote Long-term relationships.

Banco Primus favors long-term relationships with its business partners, relationships based on mutual trust in order to promote mutual growth. Business partners are a key piece of Banco Primus global strategy and sustainability vision.



To its shareholders:

Corporate Value

Banco Primus will always strive to promote the creation of corporate value and long-term growth always promoting the utmost respect for the transparency, truthfulness and uniformity in the dissemination of information.



To our society:

Environment

Banco Primus aims to promote its growth while maintaining a positive influence by seeking to minimize the environmental impact of its business operations, and to be a catalyst for positive change amongst its stakeholders.

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Community and Social Responsibility

Banco Primus will support projects, both individually and with partners, that seek to help improve the development of its community, either by helping the underprivileged groups, acting within its local school communities, or through other activities aimed to help improve the quality of life in the community, through the promotion of voluntary work by its staff., or by other projects that may help strengthen our society.



Compliance

Compliance with national, regional and international rules, laws and conventions. Our businesses shall work against corruption in all its forms including extortion and bribery.



4. What we seek to achieve

To its customers:

Banco Primus aims to achieve high customer satisfaction, at least 80% client satisfaction, to be evaluated through an end of contract questionnaire.

Banco Primus aims to have a low annual number of client complaints, less than 0,40 per 1000 contracts per year.

To its employees:

Banco Primus aims to achieve high employee satisfaction, at least 95% employee satisfaction with the workplace security, salary and overall happiness, to be evaluated through a yearly questionnaire to all employees.

Banco Primus aims to achieve high employee security regarding discrimination, at least 100% employees that feel safe regarding their sexuality, race, nationality, etc. regarding discrimination in Banco Primus, to be evaluated through a yearly questionnaire to all employees.

To its business partners:

Banco Primus aims to promote great satisfaction amongst its partners, at least 70% partner satisfaction, to be evaluated through a yearly questionnaire to our partners.

To its shareholders:

Banco Primus aims to ensure an adequate return on the shareholder investment, to be above market average.

To our society:

Banco Primus aims to have 100% green energy at its Headquarters and at the Delegations in PT and at the Branch in ES by 2024.

Banco Primus aims that from 2023 onward, 30% of the bank's car fleet is full electric and/ or hybrid plug-in.

Banco Primus will calculate its carbon footprint and put in place several initiatives to reduce carbon emissions and/ or achieve carbon neutrality. The Bank's approach will have two phases:

- i. **Phase 1 (2023):**
 - Scope 1 Emissions:
 - Emissions from Bank's vehicle fleet (combustion part)
 - Scope 2 Emissions:
 - Emissions from Bank's electricity consumption
 - Emissions from Bank's vehicle fleet (electricity part)
 - Scope 3 Emissions:
 - Emissions from Bank's Business Travel (excluding business travel included in Scope 1 and 2 emissions regarding vehicle fleet)
 - Emissions from Bank's employee commuting
- ii. **Phase 2 (2024 and onwards):**
 - Scope 3 Emissions:
 - Purchase of Goods
 - Other (not covered in Scope 1 and 2 emissions)

5. Governance

Banco Primus's Corporate Social Responsibilities commitments and goals shall be followed in a specific committee which will be responsible for:

- iii. Formulating recommendations to the Board of Directors regarding the CSR Policy and its updates;
- iv. Approving and/ or recommending projects that are in line with this policy;
- v. Suggest areas of CSR intervention regarding internal procedures;
- vi. Recommending the amount of expenditure for specific CSR activities;
- vii. Monitoring CSR activities;
- viii. Approving the annual CSR Report (to be evaluated if it will be an autonomous report or within our current Annual Financial/ Management Report/ Statements).