

PR031 v02

COMPLAINTS HANDLING POLICY

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The signatures below certify that this procedure has been reviewed and approved and demonstrate that the signatories are aware of the requirements contained in this document and that they are committed to ensure that the principles set out in it are implemented:

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1. Object

Oxy Capital - SGOIC, S.A. ("Oxy" or "Company"), as a management company governed by the provisions of the Asset Management Regime ("Regime de Gestão de Ativos" or "RGA"), is obliged to establish and implement effective and transparent procedures for the adequate and swift handling of complaints submitted by its investors.

The purpose of this policy is therefore to define the set of existing procedures for submitting and handling complaints adopted by Oxy.

2. Scope

This Policy applies to all employees of Oxy (the "Employees").

3. Definition

For the purposes of this Policy, a complaint is any formal communication from investors to Oxy regarding any disagreement or dissatisfaction with the products offered or services provided by Oxy.

4. Internal organisation

The management and handling of complaints is the responsibility of the Internal Control Department, always under the supervision of the Compliance Officer.

5. Guiding principles

Oxy analyses and handles complaints according to a set of principles such as:

- a) **Principle of equality:** Oxy, in all contacts and/or analyses it carries out with its investors, promotes their equal treatment, refraining from conducts that promote different treatment in manifestly similar situations, and ensuring that there is no discriminatory behavior.
- b) **Principle of transparency:** When dealing with complaints submitted to it, Oxy always promotes transparency, endeavoring to provide all the necessary information in a rigorous, clear, simple, reliable and objective manner, avoiding misinterpretations that could frustrate investors' expectations.
- c) **Principle of adequacy:** Oxy always acts in a diligent, careful and competent manner, endeavoring at all times to offer a comprehensive response that is appropriate to the needs of each investor, ensuring to this end that all its Employees involved in the handling of complaints have sufficient and appropriate knowledge for this purpose.
- d) **Principle of efficiency and promptness:** Oxy endeavors to be efficient and swift in dealing with any questions addressed to it, and must at all times analyze the investor's specific situation, seeking to obtain as much information about the investor and/or his/her investments as possible, in order to be able to offer an adequate, complete and efficient response.

- e) **Principle of gratuitousness:** Oxy ensures at all times the existence and operation of free channels for investors to contact the Company whenever they consider it necessary.
- f) **Principle of confidentiality:** Oxy guarantees that all employees involved in the handling of complaints are subject to the duty of secrecy and confidentiality with regard to all data and information they have access to in the course of handling such complaints.

6. Ensuring adequate and sufficient resources

In order to guarantee the correct operation of its system for receiving and handling complaints, Oxy ensures that there are always:

- a) Sufficient human resources with the necessary and appropriate expertise to analyze and deal with the issues assigned to them;
- b) Sufficient and appropriate technological means to ensure that complaints are registered and dealt swiftly;
- c) An up-to-date and effectively implemented policy for receiving and handling complaints;
- d) The impartial, transparent, swift and reasoned handling of all complaints received.

7. Procedure for receiving and handling complaints

7.1. Channels for receiving complaints

Oxy offers free channels for any investor to submit a complaint, which are available on its website, namely:

- i) Contact form on the website;
- ii) Email address: compliance@oxycapital.com;
- iii) Postal address: Av. Eng. Duarte Pacheco, Amoreiras Torre 2, 15ºB, 1070-102 Lisboa;
- iv) Telephone contact: 21 820 99 10.

All Oxy investors are informed at the time of subscription about:

- a) The existence of free channels for submitting complaints, as well as where they can be found;
- b) The possibility of submitting a complaint with CMVM;
- c) The existence of a complaints handling policy, which can be made available on request.

7.2. Receipt of complaint

Any complaint received by the means referred to in the previous paragraph is forwarded to the Compliance Officer (if he/she has not received it directly) who registers the complaint in a computer file, assigning it a case number and entering the date, the identification of the complainant and the subject.

7.3. Complaint distribution

As a rule, any complaints received will be analyzed by the Compliance Officer. However, whenever any of the circumstances described below arise, the procedure will be different:

- a) Heavy workload of the Compliance Officer that does not allow the complaint to be dealt swiftly: in this situation, the Compliance Officer should assign the complaint to one of the employees of the Internal Control Department, taking into account both their workload and the issue in question;
- b) The complaint concerns the Compliance Officer: in these situations, the complaint is sent directly to the Board of Directors, which is responsible for handling it;
- c) Existence of a conflict of interest between the complainant and the Compliance Officer: in these situations the complaint is sent directly to the Board of Directors, which is responsible for handling it;
- d) Cases of particular complexity: in these situations the complaint is sent directly to the Board of Directors, which is responsible for handling it.

The distribution of the complaint should not exceed a maximum of 2 (two) working days.

7.4. Prior analysis of the complaint

Once the complaint has been received, it must be analyzed for completeness and the following fields must be checked:

- a) Investors' full identification;
- b) Investors' direct contacts;
- c) Fund to which it relates;
- d) Date / period of occurrence;
- e) Brief description of the factual situation;
- f) Presentation of the request / issue which the investors wish to be considered;
- g) Employees involved (if applicable);
- h) Third parties involved (if applicable);
- i) Relevant additional elements (if applicable);

In the event that the communication does not contain the minimum information described above, the person responsible for handling the complaint must, within a maximum of two (2) working days, contact the investor so that he/she can complete the missing data and/or information. This contact can be made either by telephone or by email, and in both cases records of the interaction will be kept.

The request must indicate a maximum deadline of 5 (five) working days for a response, stating that if this deadline is not met, the case will be closed.

Once the deadline has passed without the customer having replied or completed the request, the person responsible for handling the complaint closes the case by sending an email or registered letter, which are recorded in the computer system.

7.5. Analysis of the complaint

Once the completeness of the complaint has been verified, the person responsible for handling the complaint begins to analyze it, summarizing it in writing and includes at least the following fields:

- a) A summary of the situation described;
- b) The legal framework of the situation;
- c) The verification or non-verification of the compliance of the reported situation with the applicable legal framework and with the policies and procedures adopted by the Company;
- d) Presentation of a solution or indication of the impossibility of presenting a solution, which must be duly substantiated (legally or financially depending on the case in question);
- e) Indication that if the investor does not agree with the proposed analysis and/or solution, he/she may complain to the Portuguese Securities Market Commission ("CMVM");
- f) Copy of the relevant documents.

7.6. Archive and closure

Once the complaint has been analyzed, it can take different courses depending on who made it.

| Responsible for handling the complaint | Proceedings |
|--|--|
| Compliance Officer | The Compliance Officer sends the reply to the complainant, files it and closes the case in the computer system. |
| Board of Directors | The Board of Directors sends the reply to the complainant and asks the Compliance Officer to file and close the case. |
| Employee | The employee sends the proposed response to the Compliance Officer, who validates it and then sends the response to the complainant, files it and closes the case. |

The maximum period for analyzing and sending the complainant the response to the complaint should not exceed 5 (five) working days from the completion of the process.

Each case must be recorded in the computer file and in a digital folder, containing, at least:

- a. The initial complaint;
- b. The identification of the complainant;
- c. The date the complaint was filed;
- d. Correspondence exchanged with the complainant (if any);
- e. Analysis and proposal of response and/or solution;

- f. Record of the final response sent to the complainant and its date.

8. Maximum case duration

Oxy undertakes to comply with the deadlines indicated throughout this policy, endeavoring, whenever possible, to speed up and anticipate the deadlines indicated.

Whenever it is not possible to fulfil the above-mentioned deadlines, Oxy shall contact the complainant, explaining the reason behind the delay in sending the reply.

9. Review

This policy will be reviewed annually or whenever justified following any legal or regulatory change.