Complaints Handling Policy

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ATLANTICO EUROPA

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1. Introduction

This document sets out the principles and procedures adopted by Banco Atlântico Europa, S.A. ("the Bank") for the management and handling of complaints submitted to it by its customers.

The purpose of this Complaints Handling Policy ("Policy") is to ensure the prompt and efficient handling of complaints submitted by customers, to ensure that they are informed of their rights, and to set out the relevant internal procedures in this regard.

The correct implementation of this policy should help to safeguard the relationship with the customer and contribute to protecting the Bank's image and reputation, whilst facilitating the proper management of operational risks relating to the complaints lodged.

The Bank is committed to dealing promptly and efficiently with all complaints submitted by its customers regarding the services it provides and the products it sells.

2. Regulations

Customers' right to make a complaint and the Bank's obligations regarding complaints are governed by the following legislation:

Decree-Law No. 156/2005 of 15 September, which establishes the obligation to maintain and make available a Complaints Book in all establishments supplying goods or providing services;

Administrative Order No. 201-A/2017, of 30 June, approving the template, layout, prices, supply and distribution of the complaints book, in both physical and electronic formats, and setting out the features of the digital platform providing the electronic version of the complaints book.Bank of Portugal Instruction No. 18/2008, which implements a service within the BPnet electronic communication system to simplify and facilitate the processing of complaints from bank customers;

Decree-Law No. 74/2017, which implements the SIMPLEX+ 2016 measures 'Online complaints book', which involves the provision of a digital platform enabling consumers to lodge complaints and submit requests for information from in a paperless format, as well as to consult structured information, thereby promoting a swifter and more effective handling of requests and greater customer satisfaction.

CMVM Regulation No. 7/2020, which sets out the form and content of the obligation for financial intermediaries, entities responsible for the management of collective investment schemes and entities managing electronic crowdfunding platforms to provide information to the CMVM regarding complaints lodged by retail investors.

Circular Letter No. CC/2026/00000018, which sets out the recommended procedures for handling complaints. It repeals Circular Letters No. 6/2008/DSB and No. 25/2008/DSB.

3. Definitions

For the purposes of this Policy, the terms specified below have the meanings set out below.

"Complaint": an oral or written communication submitted by a complainant, expressing their dissatisfaction with any service provided, transaction carried out or product supplied by the Bank.

"Complainant": Any natural or legal person who wishes, through oral or written communication, to express their dissatisfaction with a service provided, a transaction carried out or a product supplied.

"Customer": any individual or legal entity to whom the Bank supplies products or provides services, including, but not limited to, depositors, investors in financial instruments and market counterparties.

"Employee": includes all employees of the Bank who are employed under an employment contract, members of the governing bodies, service providers and all persons carrying out activities on behalf of the Bank, regardless of the nature of their relationship with the Bank or the type of activity carried out.

4. General principles

The implementation of the complaints-handling procedures must ensure that all complaints from complainants are dealt with correctly and that each one receives a response within a reasonable timeframe.

When dealing with complaints, the Bank's staff must act in accordance with the principles of objectivity and impartiality, considering the reasons put forward by complainants impartially and assessing their relevance regardless of the outcome this may lead to.

When interacting with complainants, the Bank's staff must act courteously and cordially.

Staff members who receive complaints must inform the complainant of the administrative procedure for their complaint, whilst refraining from expressing any opinion on its content.

5. Submission of Complaints

Complaints may be submitted orally or in writing.

Complaints must be submitted, either in person or through a representative, by the following means:

a) By letter, addressed to Banco Atlântico Europa, S.A. (Avenida da Liberdade no. 259, 1250-143 Lisbon);
b) Email, via the address provided for this purpose: reclamacoes@atlantico.eu;
c) Telephone, on (+351) 210 403 400;
d) Entry in the physical Complaints Book, available at any of the Bank's branches;
e) Submitting a complaint via the Electronic Complaints Book;
f) Submitting a complaint via the Queixa Portal;
g) Submitting a complaint via Deco Proteste;
h) Submitting a complaint via the websites of the supervisory authorities;

In the case of complaints made verbally, the complainant should be encouraged to submit the complaint in writing. If the complainant does not submit the complaint in writing, it must be recorded in writing by the member of staff who receives the complaint.

In the complaint, the complainant must state:

a) Their full name and address;
b) The reason for the complaint;
c) The organisational unit where the events forming the subject of the complaint took place;
d) The employee against whom the facts forming the subject of the complaint are levelled.

The member of staff in the commercial department who receives the complaint must confirm that the details described in point (c) of the previous paragraph are correct.

Complaints must be accompanied by all documents or other evidence in the complainant's possession that demonstrate the facts forming the subject of the complaint, or that are relevant to its assessment.

In cases where the complainant's identity is insufficiently established or the grounds for the complaint are manifestly insufficient, the Compliance Department shall request the complainant to supplement the information provided, with the warning that, should they fail to do so within a specified timeframe, the complaint will be closed.

6. Rejection of Complaints

All complaints must be duly examined by the Compliance Department; a complaint may only be rejected at the outset in the event of:

The complaint is unintelligible;

a)

b) Omission of information essential to the processing of the complaint;
c) In cases where the complainant's identity is insufficiently established or the grounds for the complaint are manifestly insufficient, and the stipulated time limit has elapsed without the complaint having been rectified; or where
d) The subject matter of the complaint is identical to that of another complaint, whether pending or already considered, submitted by the same complainant.

In such cases, the complainant must be notified of the rejection of the complaint, stating the reasons, except where the reason for rejection is insufficient identification of the complainant and this insufficiency prevents such notification.

7. Complaints Procedure

7.1. Physical Complaints Book

Whenever a complainant requests the Complaints Book, it must be handed to them and the registration of the complaint must be supervised by a Bank employee.

The original copy of the complaint must be detached and sent to the Bank of Portugal and to the Portuguese Securities Market Commission, in the case of complaints relating to financial intermediation, within 10 (ten) working days.

The Employee must provide the customer with a copy of the complaint form and retain the other copy, which shall form an integral part of the Complaints Register and must not be removed from it. The Bank must send a written reply to the complainant and forward the complaint to the supervisory authority (the Bank of Portugal or the CMVM, as applicable), accompanied by (a) the Bank's response, (b) a copy of the communication sent to the customer, and (c) the relevant documentary evidence concerning the facts complained of, in accordance with the provisions of Decree-Law No. 156/2005 and Circular Letter No. CC/2026/00000018.

7.2. *Electronic Complaints Register*

The Bank is required to maintain an electronic version of the complaints register, in accordance with the provisions of paragraphs 2 and 3 of Article 9 of Decree-Law No. 156/2005; the physical version shall never replace the electronic version.

Access to the digital platform (Electronic Complaints Book) must be made available in a prominent position on the website.

The response to the complaint submitted must be sent to the Bank of Portugal and, in the case of complaints relating to financial intermediation activities, to the Portuguese Securities Market Commission, within 15 (fifteen) working days.

7.3. Complaints referred by the Supervisory Authorities

In the case of complaints submitted by the complainant directly to the supervisory authority and forwarded by the latter to the Bank, the Bank must deal with and resolve them within 15 (fifteen) working days of receipt.

During this same period, the Bank must send a written reply to the complainant setting out the outcome of the investigation into the complaint, in accordance with the provisions of

Circular Letter No. CC/2026/00000018. It must also send the supervisory authority a copy of the reply sent to the customer, together with any other documentation relating to the handling of the complaint, via the system provided by the supervisory authority.

In its reply to the complainant, the Bank must expressly state: (i) whether it has upheld the complaint and, if so, the appropriate measures the Bank has taken to remedy the situation; or (ii) whether it considers that there has been no breach on its part, giving reasons for this conclusion, including any other communications sent to the customer on the matter.

7.4. Complaints submitted via other channels

In the case of complaints submitted via the channels mentioned in point 5, which are not covered by the preceding points, and forwarded by those channels to the Bank, the Bank must process and resolve them within 10 (ten) working days of receipt.

Regardless of whether a complaint has been formally lodged, any report received informally by the Bank's staff must be reported immediately to the Compliance Department, in writing.

All complaints, regardless of the channel used to submit them, must be fully and comprehensively investigated by the Compliance Department. Where it deems it appropriate, the Compliance Department may discuss the content of the complaint and the approach to be taken with the Director responsible for the relevant area. Where justified, the matter will be referred to the Executive Committee for a decision.

8. Responsibility

Complaints submitted by complainants must be forwarded to the Compliance Department, which is responsible for preparing the necessary formal response to the complainant.

Without prejudice to any need to consult the staff members directly involved in the situation that gave rise to the complainant's complaint, the staff members who carried out the act that is the subject of the complaint must not have access to the information or the complaint.

Upon receipt of a Complaint, the Compliance Department must:

i. Examine the complaint, if necessary, with the support of all departments it deems relevant;

ii. Investigate, in consultation with the employees involved, all the facts that led to the submission of the complaint, gathering all the information necessary for a fair assessment of the complaint;
iii. Assess the information gathered and prepare a proposal for resolving the situation and a response to the complainant;
v. Once the response to the complainant has been prepared, notify the complainant and the Supervisory Authority.

During the fact-finding stage, should it prove absolutely necessary for a full clarification of the situation raised in the complaint, the complainant may be contacted in order to obtain further clarification and/or additional documents.

Employees are required to provide the Compliance Department with all the information it requests as quickly as possible.

Whenever a complaint is deemed to be justified, the Compliance Department must notify the following of its decision:

i. To the organisational units where the events forming the subject of the complaint took place;
ii. To the employee responsible for the events that are the subject of the complaint; and
iii. To the line manager of the employee responsible for the facts forming the subject of the complaint.

9. Withdrawal of the Complaint

Complainants may withdraw their complaints at any time, using any of the methods set out in Chapter 5.

Withdrawal results in the immediate closure of the case by the Compliance Department, without prejudice to the recording of the complaint.

10. Retention of information

The Compliance Department shall maintain a record, for a period of 20 (twenty) years, of all Complaints submitted, containing at least the following information: (i) the date on

which the Complaint was submitted; (ii) the complainant's details; (iii) the content of the Complaint; (iv) the Bank's activity relating to the Complaint; (v) identification of the staff members identified as responsible for the acts forming the subject of the Complaint; (vi) the date on which the events referred to by the complainant occurred; (vii) the Compliance Department's assessment of the Complaint; (viii) measures taken or to be taken to resolve the matter; (ix) the date of the reply to the complainant; and (x) the date on which the Complaint and/or documentation was sent to the Supervisory Authority.

The Compliance Department will organise the filing of complaints received in the form of individual files, which will include a copy of the complaint and copies of all correspondence exchanged with the complainant and with the supervisory authorities.

11. Confidentiality

Complaints shall always be treated as "Confidential Documents"; therefore, electronic records must be stored in a secure archive and paper documents kept in a locked cabinet with restricted access.

12. Dispute Resolution

Regardless of how it was received, any complaint that indicates a threat of litigation must be brought to the attention of the Director responsible for compliance.

If the complainant does not agree with the resolution of the matter in question, they must be informed that they may appeal to the Supervisory Authority or to the courts as bodies responsible for resolving disputes.

13. Alternative dispute resolution

The Bank also ensures that its customers have access to alternative dispute resolution mechanisms, as the Bank is a member of a number of dispute arbitration centres. Similarly, customers who are classified as retail investors may also make use of alternative dispute resolution, having access to such mechanisms under the Protocol on Alternative Dispute Resolution Mechanisms entered into with the CMVM.

Further details regarding alternative dispute resolution are available on the Bank's website.

14. Controls

As part of its control activities, the Compliance Department carries out regular checks on the management and handling of complaints received by the Bank, including those received by the Namibian Branch, which are detailed in the Compliance Procedures Manual.

15. Reports

Every quarter, the Compliance Department produces a report on its activities, which includes its work directly related to the receipt and handling of complaints; this report is submitted to the Board of Directors for information and consideration, as well as for the approval of any corrective measures it deems appropriate to implement. At the same time, the Compliance Department also submits information on its activities directly related to the receipt and handling of complaints to the Internal Control Committee and the Supervisory Board.

16. Reports

Every six months, the Compliance Department reports to the Portuguese Securities Market Commission (CMVM) on complaints lodged by retail investors, including information on complaints that are ongoing and those that have been resolved during the half-year in question, relating to financial intermediation activities. The report must be submitted by the last day of the month following the end of the half-year to which the information relates.

17. Customer Information

Clients may request a copy of the Bank's "Complaints Handling Policy" at any time.

Without prejudice to clients' right of access to this Policy, they must be informed of the following:

The Bank ensures that customer complaints are handled appropriately, in accordance with current legislation on the Complaints Register and other applicable regulations, as well as its "Complaints Handling Policy". Accordingly, the receipt, referral and handling of

complaints will always be carried out by a person other than the one who performed the act that is the subject of the complaint.

18. Approval and revisions

This policy is approved by the Bank's Board of Directors and may be amended by resolution of that body.

This policy shall be reviewed every two years, during which time the Compliance Department shall assess the suitability and effectiveness of the measures set out therein.