

Policy for the Management and Processing of Complaints from Investors/Non-qualified Customers

Index

1. FRAMEWORK.....	2
2. MEANS AVAILABLE FOR THE PRESENTATION OF COMPLAINTS	2
3. OBJECTIVE	3
4. METHODOLOGY IN THE MANAGEMENT OF COMPLAINTS.....	3
4.1. Receiving and coding the Complaint.....	3
4.2. Archiving, Invitation to Improvement or Referral of the complaint	4
4.3. Processing, Decision and Communication	4
4.4. Register and File of Complaints	5
4.5. Intervention of the Portuguese Stock Market Regulator	5
4.6. Evidence of unlawful practice.....	5
5. GRATUITY OF THE COMPLAINT.....	5
6. DISCLOSURE OF THE POLICY	

1. FRAMEWORK

Interfundos – Sociedade Gestora de Organismos de Investimento Coletivo, S.A. (hereinafter "Interfundos") is a company whose capital is wholly owned by Banco Comercial Português S.A. - parent company of the Banco Comercial Português Group, whose purpose is the management and administration of Real Estate Alternative Investment Organisations (hereinafter "Real Estate AIO"), an activity that may give rise to dissatisfaction with the service provided, this dissatisfaction being either justified or unjustified.

In view of the above, in accordance with the provisions of the legal and regulatory rules, Interfundos has implemented a procedure that guarantees unqualified, dissatisfied Investors/Customers with Real Estate AIO managed and administered by it, an adequate, quick, independent and fast processing of Complaints they wish to submit.

2. MEANS AVAILABLE FOR THE PRESENTATION OF COMPLAINTS

Internal Channels/Interfundos and Group

Interfundos	Letter to: Av. Prof. Doutor Cavaco Silva, Parque das Tecnologias, Edifício 3, n.º 28, 2740-256 Porto Salvo, Oeiras e-mail to: interfundos@interfundos.pt
BancoMail	BancoMail email box with access through www.millenniumbcp.pt
Millennium bcp Centro de Atenção ao Cliente (Customer Care Centre)	By e-mail addressed to centroatencaoaocliente@millenniumbcp.pt By post addressed to Millennium bcp, Centro de Atenção ao Cliente – Avenida Prof. Doutor Cavaco Silva (Tagus Park), Edifício 3, n.º28, 2740-256 Porto Salvo
Millennium bcp Client's Ombudsman Office	By e-mail addressed to provedoria.cliente@millenniumbcp.pt By filling in the contact e-form, available at www.millenniumbcp.pt (Ombudsman) By post addressed to Millennium bcp, Provedoria do Cliente – Rua Augusta, n.º 84, Piso 2, 1100-053 Lisboa
Millennium bcp Data Protection Officer (Complaints related to personal data)	By e-mail addressed to protecao.dados.pessoais@millenniumbcp.pt

External Channels/Supervisors

Comissão do Mercado de Valores Mobiliários (Portuguese Stock Market Regulator)- Serviço de Apoio ao Investidor (Investor Support Service)	Serviço de Apoio ao Investidor by filling in the form at www.cmvm.pt By letter addressed to CMVM - Serviço de Apoio ao Investidor, Rua Laura Alves, nº 4, Apartado 14258 1064-003 Lisboa, Portugal
Comissão Nacional de Proteção de Dados (Portuguese Data Protection Authority)	Complaints/Complaints form available at www.cnpd.pt Email to geral@cnpd.pt
Complaints E-Book	www.livroreclamacoes.pt

3. OBJECTIVE

Without prejudice to the multiplicity of channels and means available for submitting Complaints (as referred to in the previous chapter), this Policy for the Management and Processing of Complaints of Investors/non-qualified Customers (hereinafter "Policy") aims to inform Interfundos Investors/Customers that it has a procedure in place that guarantees them - if they wish, in the event of any dissatisfaction with the service provided - the possibility of submitting a complaint and the guarantee that it will be considered in accordance with rules that are clearly defined in advance.

4. METHODOLOGY IN THE MANAGEMENT OF COMPLAINTS

The entire process must be controlled and monitored by the Corporate and Institutional Relations Area of Interfundos (hereinafter 'CRI'), under the terms set out below.

4.1. Receiving and coding the Complaint

The Executive Committee and the CRI must be immediately informed of any complaint that enters Interfundos.

A copy of the received complaint, any clarifications on the subject of the complaint and information on the follow-up given to it, must be of the CMVM knowledge, within a maximum of 15 business days, as from the receipt of the complaint.

All Complaints are registered with the day they are received at Interfundos and with a certain sequential number that will respect the chronological order of that entry, giving rise to a process; if Complaints are received by Interfundos through forwarding by another Group entity, Interfundos must acknowledge receipt of the complaint to that entity.

All documents relating to a specific claim have the complaint number to which they refer, and are filed in the corresponding file.

All Complaints should be analysed and answered within 15 business days as from their receipt by Interfundos.

Whenever it is expected to be unlikely or even impossible to complete the processing within that period (15 working days), a letter should be sent to the Investor, acknowledging receipt of the complaint, before the expiry of 5 working days from the date of its receipt (difficulty in complying with the expected service level - 15 working days - should be presumed - whenever it is concluded that it is necessary to consult Interfundos' legal advisors or to have another Group company intervene).

The CRI is responsible for monitoring compliance with deadlines at the different stages of the complaint processing.

4.2. Archiving, Invitation to Improvement or Referral of the complaint

After the complaint has been received by Interfundos, the CRI is responsible for submitting to the Executive Committee one of the following three proposals with due justification:

- archiving of the complaint when: (i) the situation or fact complained occurred more than **10** years ago, (ii) it is not possible to identify the complainant or (iii) it is manifest and evident that its object is unfounded;
- improvement of the complaint by the Investor when: (i) the complaint is written in an unintelligible manner, (ii) it is not dated, (iii) it does not clearly and properly contextualise the issue, (iv) it does not date the situation and/or the facts complained, (v) it does not identify the Employee or Area/service complained about, (vi) it is not integrated by documentation that supports the allegations;
- refer the complaint for processing, in compliance with the principle "processing of the complaint by an Employee different from that of which the act complained of", contained in the Securities Code; if the CRI considers that the object of the complaint is related to services provided by another company of the Group, then its proposal for referral must reflect this understanding.

The CRI proposal must be decided by at least one of the members of the Executive Committee.

Like the CRI proposal, the Executive Committee's decision can also be in one of three different directions: archiving, improving or referral.

The Executive Committee does not have to follow the CRI's recommendation, and may decide differently from the one suggested to it and even contrary to the one proposed to it, with due justification.

4.3. Processing, Decision and Communication

The Interfundos Area to which the Executive Committee forwards the complaint:

- will take the necessary steps to process it, including, where appropriate, asking the CRI to consult with Interfundos' legal advisors;
- must formalise, together with the CRI, a final resolution/decision proposal under the current regulations.

If the Executive Committee concludes that the complaint's subject relates to services provided by another company in the Group, then the CRI will be responsible for leading the entire subsequent process. In these cases, the CRI will send to that other entity of the Group a scanned copy of the correspondence and documents that may be received and will request that the said entity pronounce on the complaint, preferably via e-mail, urgently, alerting that compliance with a legal obligation is at stake.

Upon receipt of the proposal from the Interfundos Area that processed the complaint or information from another entity of the Group, the CRI is responsible for submitting for approval by the Executive Committee the response proposal to the complaint.

If the complaint specifically targets a specific Employee and/or Area, Interfundos will not make any decision on the content of the complaint without prior hearing of that Employee (if still part of the Group and working) and/or that Area.

Decisions on Complaints must be founded on rational and objective criteria.

The outcome of the process, whether favourable or unfavourable to the complainant, is always communicated to them by email or registered letter (depending on the form used by the investor to present their complaint), and, when unfavourable, the grounds for the decision must be stated.

The decision taken and communicated to the complainant is always, afterwards, made known to the

CMVM.

At the conclusion of each complaint process, there will be the signature of at least one of the members of the Executive Committee.

4.4. Register and File of Complaints

All Complaints received at Interfundos are subject to a record that must include:

- The identity of the complainant;
- The date of receipt of the complaint;
- Description of the facts, briefly, clearly and accurately;
- The identity, if applicable, of the Employee or service that has been complained;
- The Area responsible for a resolution/decision proposal;
- The decision taken;
- The date of the decision communication to the complainant.

Interfundos undertakes to keep an archive of all complaint files for a period of 10 years, however they may be microfilmed after 5 years.

Complaint processes, before being destroyed, must be fully scanned and kept for a total period of 20 years, including the 10 years referred to above, corresponding to the ordinary limitation period (art.309 of the Civil Code).

4.5. Intervention of the Portuguese Stock Market Regulator

The investor may submit their complaint to the CMVM (Behavioural and Investor Supervision Department) in the following two situations: failure to respond from Interfundos within 15 working days or disagreement with the decision communicated by Interfundos.

In this case, the way and timing of Interfundos' intervention in the process will be dictated by the CMVM, under the terms and conditions that may be communicated.

4.6. Evidence of unlawful practice

Immediately and compulsorily notify the Compliance Office (to the e-mail [CC0588](#)), cases where there is a suspicion that a criminal offence has been committed, such as money laundering, terrorism financing or corruption.

If the analysis of the complaint reveals evidence of unlawful practice, Interfundos will inform the Group's Audit Division of it and, where applicable, the Compliance Office.

5. GRATUITY OF THE COMPLAINT

The receipt, processing and management of the complaint, including the provision of the reply, are entirely free of charge for the complainant.

Date of entry into force: 24.10.2024