




COMPLAINTS MANAGEMENT AND CUSTOMER OMBUDSMAN REGULATION

RNA – Rede Nacional de Assistência, S.A

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ARTICLE 1 – PURPOSE

RNA Assistência, hereinafter referred to simply as RNA, recognizes that the efficient management of complaints is a key element in strengthening the trust of its clients and partners, reflecting the company's commitment to quality, responsibility, and the continuous improvement of the services it provides in the areas of travel assistance, health, home assistance, and other complementary domains of insurance activity.

As a service provider and parent company of RNA Seguros, RNA plays a central role in the customer protection value chain and is required, under Regulatory Standard no. 7/2022-R issued by ASF, to uphold a high standard of conduct in the receipt, analysis, and response to complaints addressed to it.

The proper, prompt, and impartial handling of complaints therefore represents a strategic instrument for customer satisfaction and loyalty, contributing to transparency, credibility, and excellence in the provision of assistance services.

The purpose of this regulation is to define, in a clear and structured manner, the principles and procedures governing the receipt, registration, analysis, handling, and response to complaints received by RNA, ensuring that they are managed rigorously, fairly, and in compliance with applicable laws and regulations, namely Regulatory Standard no. 7/2022-R of June 7 and Law no. 147/2015 of September 9.

ARTICLE 2 – DEFINITIONS

For the purposes of this document, the following definitions apply:

- **Complaint** – any expression of disagreement regarding a position taken by an insurance company or managing entity, or dissatisfaction with the services provided by them, as well as any allegation of potential non-compliance, submitted by clients. The concept of “complaint” excludes statements made within the scope of contractual negotiations, requests for compliance with legal or contractual obligations, communications inherent to claims settlement or assistance processes, and requests for information or clarification.
- **Request for Information** – a request submitted to RNA with the purpose of obtaining clarification, additional information, or guidance regarding products, services, procedures, or contractual obligations, which does not express dissatisfaction, disagreement, or dispute.
- **Complainant** – any natural or legal person, policyholder, insured person, beneficiary, injured third party, or any other party claiming a legitimate interest, who submits a complaint under the terms provided by applicable law and regulation.

- **Communication Channel** – any means made available by RNA for receiving complaints, including in-person service, postal mail, email, telephone, electronic platforms, as well as channels of competent external entities.
- **Customer Ombudsman** – the Customer Ombudsman of RNA Assistência is appointed internally and reports directly to the company's Board of Directors, while ensuring autonomous and impartial performance of duties. Although not structurally independent, the Ombudsman operates with functional autonomy, free from operational or commercial interference, ensuring fair and diligent handling of complaints in accordance with the principles established in Regulatory Standard no. 7/2022-R issued by ASF.
- **Recommendation** – guidance issued by the Customer Ombudsman resulting from an analysis of the procedures and decisions of the insurance company or managing entity, which may include corrective measures or adjustments to one or more implemented procedures.
- **Durable Medium** – any instrument that enables information addressed personally to the recipient to be stored in such a way that it can be accessed and consulted at a later time for a period appropriate to its purpose, and which allows for the exact reproduction of the stored information.

ARTICLE 3 – SUBMISSION OF COMPLAINTS

RNA provides its clients with a single, centralized channel for the submission and monitoring of complaints, ensuring clarity, accessibility, and efficiency throughout the process.

Complaints must be submitted in writing, preferably in digital format, to the Complaints Management Unit via the email address apoio.clientes@rna.com.pt, which serves as the official point of receipt and response.

Through this same channel, the complainant may monitor the status of their complaint, obtain additional information, and request access to related documentation, in accordance with applicable legal conditions.

Acknowledgment of receipt of the complaint will be sent within a maximum of five working days, and a final response will be provided within up to twenty working days. To ensure prompt and effective handling, the complaint must include, at a minimum, the following information:

- Full name of the complainant and, where applicable, their representative;

- The complainant's capacity within the scope of insurance activity (policyholder, insured person, beneficiary, injured third party, member, contributor, participant, or beneficiary);
- Contact details (telephone, email address, and postal address) of the complainant and, where applicable, their representative;
- Identification document number;
- A clear and detailed description of the facts, including identification of the parties involved and, where possible, the date of occurrence;
- Date and place of submission of the complaint.

If the complaint does not contain the essential elements required for its handling, RNA shall notify the complainant, requesting correction or completion within twenty working days. A complaint may only be deemed inadmissible in the following cases:

1. Omissions persist that prevent its proper analysis after the deadline granted for correction;
2. The matter falls under the exclusive jurisdiction of arbitral or judicial bodies, or has already been decided by such bodies;
3. The complaint concerns a repeated issue that has already been duly addressed;
4. The complaint has not been submitted in good faith or contains offensive or abusive content.

Whenever a complaint is not admitted, RNA shall inform the complainant, in writing and with proper justification, of the reasons for that decision, always preserving the right to resort to the courts or to alternative dispute resolution mechanisms, including cross-border disputes.

ARTICLE 4 – HANDLING OF COMPLAINTS

Upon receipt of a complaint, RNA Seguros shall send the complainant a written acknowledgment within a maximum of five working days.

The Complaints Management Unit, integrated within the Legal and Compliance Department, records all complaints received, assigning a sequential number and classifying them in accordance with the structure defined by ASF reporting templates, including, where applicable, the product code.

The entire complaints process is recorded in the GIA system, which integrates all associated documentation and elements, controls deadlines, and monitors responses from internal departments and service providers/partners.

A detailed and impartial analysis then follows, with possible requests for clarification addressed to the relevant internal departments and service providers/partners, with the aim of preparing a substantiated response.

Whenever a complaint does not relate to RNA's activity, the complainant shall be informed and, where applicable, the complaint shall be forwarded to the responsible entity.

Communications with policyholders, insured persons, beneficiaries, or injured third parties are always made in writing or on a durable medium accessible to the complainant, preferably in digital format, using clear and understandable language.

If failure to meet internal deadlines is anticipated, the complainant shall be informed accordingly, including a revised expected completion date and details of the actions underway.

The final response shall be provided within a maximum period of twenty working days from receipt of the complaint or of the elements necessary for its assessment.

If the decision does not fully satisfy the complainant, the available options to pursue the matter further shall be indicated, in accordance with applicable laws and regulations.

The response to the complainant must be complete and duly reasoned, including specification of the applicable legal and contractual provisions, and tailored to the complainant's profile to ensure full understanding of the decision taken.

ARTICLE 5 – CUSTOMER OMBUDSMAN

The Customer Ombudsman of RNA Assistência is appointed internally and reports directly to the company's Board of Directors, while ensuring autonomous and impartial performance of duties.

The Ombudsman reviews complaints submitted directly to them, as well as cases where the Complaints Management Unit has either failed to respond or has provided a response that did not satisfy the complainant.

Although organically integrated within the company, the Customer Ombudsman operates as an independent and impartial body, ensuring that all complaints are assessed with fairness, rigor, and respect for the rights of complainants, and issuing reasoned opinions and recommendations. The Ombudsman may also propose solutions that reconcile the legitimate interests of clients with the applicable legal and contractual framework.

ARTICLE 6 – COOPERATION WITH OTHER ENTITIES

RNA ensures close cooperation between the Complaints Management Unit and the Customer Ombudsman, as well as with dispute resolution mechanisms to which it is legally bound.

ARTICLE 7 – CONFIDENTIALITY AND PERSONAL DATA PROTECTION

RNA ensures the confidentiality and protection of personal data collected, in compliance with applicable legislation. Its privacy policy is available on the institutional website. Complaint records and related documentation are retained for a minimum period of five years.

ARTICLE 8 – INFORMATION SYSTEMS

RNA ensures the maintenance of appropriate and secure information recording systems for complaint management, as well as archiving systems, with information retained for a minimum period of five years.

ARTICLE 9 – PREVENTION AND MANAGEMENT OF CONFLICTS OF INTEREST

The management of complaints is organized in such a way as to prevent, identify, and address potential conflicts of interest, ensuring that all employees involved possess the necessary integrity and professional qualifications.

The company's organizational units continuously provide the information required for the proper performance of this function, promoting transparency, accountability, and efficiency in the process.

Employees must immediately report any situation likely to give rise to a conflict of interest in relation to a complaint under analysis and must refrain from participating in the respective process.

A conflict of interest is deemed to exist whenever an employee is directly or indirectly interested in the complaint, or when such interest exists for close family members or entities in which any of these parties hold a relevant interest or participation.

ARTICLE 10 – MONITORING AND REVIEW

RNA undertakes to implement a continuous and systematic process for analyzing customer complaints, using the results obtained to promote the ongoing improvement of its processes, operations, products, and services.

This analysis enables the identification of trends, the correction of potential deficiencies, and the anticipation of needs, ensuring that each customer interaction is handled with rigor, transparency, and efficiency.

By incorporating these findings into the review and enhancement of internal practices, RNA ensures excellence in customer service, strengthens customer trust, and guarantees that the products and services offered remain appropriate, safe, and aligned with market expectations throughout their lifecycle.

ARTICLE 11 – DISCLOSURE

The RNA Complaints Management Regulation shall be communicated to all employees through internal communication and remain permanently accessible in the institutional policy repository. It shall also be available on RNA's website, ensuring awareness and compliance throughout the organization.

ARTICLE 12 – DEFINITION AND APPROVAL

The Board of Directors is responsible for defining and approving the Complaints Management Regulation, ensuring its proper implementation and the continuous monitoring of its compliance.

ARTICLE 13 – REVIEW AND UPDATE

This regulation shall be reviewed by the Legal and Compliance Department at least once a year, or whenever strategic changes occur within the company, as well as in the event of regulatory or legislative updates impacting RNA.

Following each review, the document shall be submitted for approval by the Board of Directors, ensuring its continuous updating and alignment with strategic objectives and applicable legal and regulatory requirements.