



# COMPLAINT MANAGEMENT POLICY

## **Article 1 – OBJECTIVE**

RNA Assistência acknowledges that efficient complaint management constitutes an essential element for strengthening the relationship of trust with its clients and partners, allowing it not only to ensure the defense of their rights and expectations but also to identify opportunities for continuous improvement in the services provided and the operational processes that support them.

As a service provider and parent company of RNA Seguros, RNA Assistência assumes a central role in the insurance activity value chain. It is required, pursuant to Article 7 of ASF Regulatory Standard No. 7/2022-R of June 7, to exercise the same degree of diligence, transparency, and rigor in complaint management as applied to insurance companies.

The adequate, swift, and impartial handling of complaints thus represents a strategic instrument for client satisfaction and loyalty, contributing to institutional credibility, continuous improvement, and excellence in the provision of assistance services.

This Complaint Management Policy aims to establish a set of principles and rules that ensure the effective, transparent, and equitable treatment of complaints received by RNA Assistência, while simultaneously promoting the continuous improvement of the quality of services provided and reinforcing the trust of clients and other stakeholders.

## **Article 2 – SCOPE**

This Complaint Management Policy is applicable to all complaints received by RNA, regardless of the channel used for their submission, whether in person, by post, email, telephone, electronic platform, or any other admitted means.

It also covers all complaints submitted by clients or any other complainants who demonstrate a legitimate interest, in accordance with the law.

It further intends to safeguard the rights and interests of clients and other complainants, promote trust and transparency in the relationship between RNA and its clients and partners, contribute to the continuous improvement of the quality of products, services, and internal processes through the analysis and monitoring of received complaints, prevent litigation, and mitigate reputational and operational risks.

## **Article 3 – 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 services provided, including any allegation of non-compliance, submitted by clients. Excluded from this concept are statements made within contractual negotiations, requests for compliance with legal or

contractual obligations, communications related to claims or assistance processes, and requests for information or clarification.

- **Information Request** – Any request submitted to RNA seeking clarification, additional information, or guidance regarding products, services, procedures, or contractual obligations, which does not express dissatisfaction or dispute.
- **Claimant** – Any natural or legal person, including policyholders, insured persons, beneficiaries, injured third parties, or any other party with a legitimate interest, who submits a complaint under applicable law and regulations.
- **Communication Channel** – Any means made available by RNA to receive complaints, including in-person service, post, email, telephone, electronic platforms, and channels of competent external entities.
- **Customer Ombudsman** – The Customer Ombudsman of RNA Assistência is internally appointed and reports directly to the Board of Directors, while acting autonomously and impartially in the performance of duties. Although not structurally independent, the Ombudsman operates with functional autonomy, free from operational or commercial interference, ensuring fair and diligent complaint handling in accordance with ASF Regulatory Standard No. 7/2022-R.
- **Recommendation** – Guidance issued by the Customer Ombudsman following an analysis of the company's procedures and decisions, which may propose corrective measures or adjustments to one or more implemented procedures.

## **Article 4 – PRINCIPLES**

In addition to the principles enshrined in the RNA Code of Conduct, which is referenced regarding the fundamental values and standards that must govern the company's actions, this policy reinforces and expands the organization's commitment to adopting high levels of quality, ethics, transparency, and responsibility in complaint management.

The intention is to ensure that all procedures associated with the receipt, analysis, and treatment of complaints are aligned with the needs and expectations of clients, in compliance with applicable legal and regulatory requirements, the best practices of the insurance sector, and the strategic objectives of RNA, contributing to the strengthening of trust and the continuous improvement of the quality of services provided.

- **Transparency and Clarity** – RNA Seguros commits to providing clear, precise, and accessible information about the processes of receiving, handling, and responding to

complaints. This includes communicating deadlines, stages of the procedure, and the grounds for decisions taken, so that complainants can fully understand the management of their submission.

- **Impartiality** – All complaints are analyzed and treated in an objective, fair, and unbiased manner, ensuring that no decision is influenced by internal or external interests. The assessment of each case is based on facts, documentation, and applicable standards, ensuring that complainants are treated with equity and respect.
- **Universal and Free Access** – RNA guarantees that complaint management does not entail any burden, cost, or charge for the complainants, except those effectively indispensable for the fulfillment of the function.
- **Timeliness** – Each response is prepared based on careful analysis, documentary evidence, and consistent technical and legal criteria. Communications are clear, complete, and understandable, allowing the complainant to know the grounds for the decision and any measures taken to resolve the situation.
- **Rigor and Quality** – RNA ensures that the employees assigned to the unit involved in complaint management are qualified and suitable for the performance of their duties.
- **Qualification and Suitability** – Staff involved in complaint management are appropriately qualified and suitable.
- **Continuous Improvement** – Information and analysis obtained through complaints are systematically used to identify flaws, opportunities for improvement, or adjustments to products, services, internal processes, and service procedures. This principle allows RNA to prevent future occurrences, optimize processes, and reinforce the quality of service provided, contributing to innovation and operational excellence.

## **Article 5 – COMPLAINT MANAGEMENT FRAMEWORK**

RNA recognizes that efficient complaint management is fundamental to strengthening the relationship with clients, promoting the continuous improvement of its services, and ensuring compliance with applicable legislation and regulations. In this sense, the company commits to managing all processes related to submitted complaints in a swift, efficient, and impartial manner, ensuring that each case is analyzed with rigor and objectivity.

To this end, RNA has created a unit responsible for the management of complaints (Complaint Management Unit, integrated into the Legal and Compliance Department), which acts as a centralized point for receipt and response, duly identified internally and externally.

This function guarantees total accessibility to complainants, not implying any costs or charges, nor burdens that are not strictly necessary for the fulfillment of its mission, while also preserving the right to resort to courts or extrajudicial dispute resolution mechanisms, including cross-border disputes.

Additionally, RNA ensures the treatment and systematic analysis of data related to complaints, allowing the identification of common causes, recurrent or systemic problems, and potential legal or operational risks, and the implementation of corrective measures that contribute to the continuous improvement of products, services, and internal processes.

RNA analyzes the causes of received complaints in order to identify patterns or causes common to certain types of complaints, assess whether such causes may affect other processes or products designed and marketed by it that are not directly the subject of a complaint, and adopt measures to prevent the recurrence of identified causes.

Regardless of the organizational model adopted, the company's organizational units continuously provide the necessary information for the correct exercise of this function, promoting transparency, accountability, and process efficiency.

This commitment does not prejudice, in any case, the regime applicable to complaints formulated in the Complaint Book, in physical or electronic format, under the terms of the law and regulations in force.

Likewise, complaint management by RNA does not prejudice the right to resort to courts or extrajudicial dispute resolution mechanisms.

## **Article 6 – CUSTOMER OMBUDSMAN FRAMEWORK**

At RNA, the Client Ombudsman plays an essential role in defending the legitimate interests of clients, acting independently, impartially, and in strict compliance with applicable legal and regulatory standards.

The company also guarantees the availability of all information and documentation necessary for the exercise of the Ombudsman's duties, as well as adequate conditions for the effective fulfillment of their duties. In the scope of their duties, the Ombudsman may request consultation of records, files, archives, or any documentation relevant to the assessment of complaints.

The intervention of the Ombudsman in the assessment of complaints does not prejudice, under any circumstances, the right of clients to resort to courts or extrajudicial dispute resolution mechanisms, including those of a cross-border nature.

The powers of the Ombudsman are merely consultative, with their decisions having the character of a recommendation, not suspending any judicial deadlines nor being invocable in court, except by express agreement between the parties.

In this sense, the Ombudsman constitutes a complementary instance of protection and defense of clients, reinforcing the principles of trust, transparency, and proximity that guide RNA's activity.

In the exercise of their duties, the Ombudsman must maintain full independence and exemption.

### **Art. 7º - PREVENTION AND MANAGEMENT OF CONFLICTS OF INTEREST**

Complaint management is organized in such a way as to prevent, identify, and treat potential conflicts of interest, ensuring that all involved employees possess appropriate suitability and professional qualification.

### **Art. 8º - MONITORING AND REVIEW**

RNA commits to implementing a continuous and systematic process of analysis of complaints submitted by clients, using the results obtained to promote the continuous improvement of its processes, operations, products, and services.

This analysis allows for the identification of trends, the correction of potential deficiencies, and the anticipation of needs, ensuring that each interaction with the client is treated with rigor, transparency, and efficiency.

### **Art. 9º - DISCLOSURE**

The RNA Complaint Management Policy must be disclosed to all employees through internal communication and kept permanently accessible in the institutional repository of policies, also being available on the RNA website, thus ensuring its knowledge and compliance throughout the organization

### **Art. 10º - DEFINITION AND APPROVAL**

The Board of Directors is responsible for defining and approving the Complaint Management Policy, ensuring its adequate implementation and continuous monitoring of its compliance.

### **Art. 11º - REVIEW AND UPDATE**

This policy shall be reviewed by the Legal and Compliance Department at least once a year, or whenever strategic changes occur in the company, as well as regulatory or legislative updates that impact RNA.

After each review, the policy must be submitted for approval by the Board of Directors, ensuring its continuous updating and compliance with strategic objectives and applicable legal and regulatory requirements.