

# **IBERIS SEMPER, SOCIEDADE DE CAPITAL DE RISCO, S.A.**

## **COMPLAINT MANAGEMENT POLICY**

### **1. Introduction**

1.1 This document constitutes the complaints management policy (the "Complaints Management Policy") of IBERIS SEMPER, SOCIEDADE DE CAPITAL DE RISCO, S.A. ("Iberis").

1.2 This Policy establishes the principles and rules applicable to the treatment and relationship with investors, as well as the management of complaints submitted by them.

1.3 This Policy has been drawn up in accordance with the applicable provisions and regulations, in particular, but not limited to, the following sources:

- a) Decree-Law no. 27/2023, of 28 April, approving the asset management regime (the "AMR");
- b) Commission Delegated Regulation (EU) No 231/2013 of 19 December 2012, which develops some aspects of the AIFMD regime.

### **2. Scope of application**

The Complaints Management Policy applies to all Iberis employees, service providers and subcontractors.

### **3. General Principles**

The general principles governing the Complaints Management Policy are as follows:

- a) Acting diligently, rigorously, impartially and transparently in the management of complaints;
- b) Efficient, appropriate and swift procedures for managing and resolving investor complaints;
- c) Establishment of a function responsible for managing the processes relating to complaints, acting as a centralised point for receiving and responding to them;
- d) Providing the necessary information and clarification in a clear, correct, precise, adequate and satisfactory manner, taking into account the profile of the complainant and the nature and complexity of the situation;
- e) The free nature of the complaints management process, including their submission, processing and response;
- f) Confidentiality and secrecy of all data, information and documentation shared by investors, as well as the content of the complaint and the specific situation, avoiding unauthorised access by third parties;
- g) Processing and analysing complaint management data on an ongoing basis in order to detect and correct recurring or systemic problems and to safeguard against any legal or operational risks.

### **4. Stakeholders and Responsibilities**

4.1. The Compliance department is responsible for managing complaints.

4.2. The function responsible for managing complaints is responsible for:

- a) Managing the receipt of, analyse and ensure a response to complaints submitted to it;
- b) Keeping a permanently updated and complete record of complaints;
- c) Identify common problems systematically reported in complaints and propose corrective measures/proposals for improvement in order to prevent the recurrence of complaints for the same reasons.

4.3. All complaints received must be reported to the Compliance Department, and if they are related to the Compliance Department, the Board of Directors must be informed.

4.4. The Board of Directors is responsible for defining, implementing, evaluating and reviewing the Complaints Management Policy.

## **5. Filing complaints**

### 5.1 Complaint requirements

5.1.1 Iberis investors may submit complaints, in writing, in Portuguese or English, under the terms set out herein.

5.1.2 Claims must fulfil the following requirements:

- a) Written form;
  - b) Full identification of the Claimant and, if applicable, of the person representing them (full name, civil and tax identification number (NIF) of the claimant or, in the case of a legal person, legal person identification number (NIPC));
  - c) Reference to the quality of the complainant;
  - d) Contact details for the complainant and, if applicable, the person representing them (mobile phone and email);
  - e) Clear and reasoned identification of the issue being complained about;
  - f) Description of the facts that led to the complaint, identifying the parties involved and the date on which the facts occurred, if possible;
  - g) Additional elements that the complainant considers necessary for the management of their complaint;
- a) Date and place of the complaint.

5.1.3 Whenever the complaint submitted does not include the necessary elements for the purposes of the respective management, namely when the reason for the complaint is not materialised, Iberis will inform the complainant, inviting them to remedy the omission.

5.1.4 If the complaint submitted does not relate directly or indirectly to Iberis' activity, Iberis must inform the complainant of this fact.

5.1.5 Claims may not be accepted by Iberis when:

- a) Essential data is omitted that makes the respective management unfeasible and has not been corrected;
- b) A claim is made in relation to a matter that falls within the exclusive competence of arbitration or judicial bodies;
- c) The claim reiterates previous claims that have been submitted by the same claimant in relation to the same matter and which have already been answered by Iberis;
- d) The complaint was not submitted in good faith or its content is qualified as vexatious.

5.1.6. Whenever Iberis does not accept complaints on the grounds that the predefined admissibility requirements have not been met, it must inform the complainant of this fact, stating the reasons for the rejection.

5.2. Channels for submitting complaints:

5.2.1. Complaints lodged directly with Iberis must be sent in writing by registered post or with acknowledgement of receipt, or by email, to the following contacts:

A/C: Compliance

Address: Avenida Engenheiro Duarte Pacheco, n.º 26, 7.º, Campolide, 1070-110 Lisbon

Email address: [compliance@iberiscapital.com](mailto:compliance@iberiscapital.com)

5.2.2. Investors may also address their complaints directly to the Portuguese Securities Market Commission (CMVM), to the following contacts:

Address: Rua Laura Alves, n.º. 4 - Apartado 14258 1064-003 Lisboa

E-mail address: [cmvm@cmvm.pt](mailto:cmvm@cmvm.pt)

## **6. Analysis and Management of Complaints**

6.1 Once a complaint has been received, it is registered in Iberis' systems.

6.2 On the date of registration, or within a maximum of 3 (three) working days, the complainant must acknowledge receipt of the complaint, preferably by email.

6.3 Based on an analysis of all the information and evidence gathered, a response will be drawn up and sent to the complainant within a maximum of 15 (fifteen) working days of receipt of the complaint.

6.4 The response to the complainant must include the following elements:

- a) The identification of the person responsible for analysing the complaint;
- b) The final decision/pronouncement on whether the complaint is considered to be well-founded;

c) The assessment made, duly substantiated, namely by identifying the objective criteria for analysis and demonstrating that all relevant aspects have been fully and adequately analysed and investigated;

d) In applicable cases, an indication of the measures implemented to resolve the situation;

e) If the complaint was not upheld, provide justification;

6.5. In situations where carrying out the necessary steps to analyse the complaint prevents the internal deadlines set for responding to the complaint from being met, the complainant must be informed as soon as possible and in a reasoned manner, indicating the estimated date for completion of the analysis.

#### **7. Archiving, Preservation and Dissemination:**

a) The Compliance Department is responsible for keeping an organised archive of the complaints submitted, in paper or computerised form, for a minimum period of 7 (seven) years.

b) The Compliance Department is responsible for providing all the information that the competent supervisory authorities may request.

c) The Complaints Management Policy is made available to the public by making it available on the Iberis website and, whenever requested, by delivering or sending it on paper or by e-mail.

#### **8. Duration**

The Complaints Management Policy will be in force indefinitely, without prejudice to its updating and revision, as well as the annual assessment to be carried out under the terms set out herein.