

## **ODDO BHF SCA Spanish Branch - Customer's claim processing policy**

In accordance with the Spanish Order ECO/734/2004, of 11 March 2004, on customer care services and with the MFID II Directive (the "Regulations"), the Spanish Branch of ODDO BHF SCA – Corporates & Markets (hereafter "the Branch") maintains a customer's claim processing policy with a view to their processing as soon as possible.

### **1. DEFINITIONS**

For the purposes of these Regulations, and unless explicitly stated otherwise, the following terms have the following meanings:

- (i) "**customer**": all those individuals or legal entities, Spanish or foreign, who qualify as users of the financial services provided by the Branch, whether acting in their own name and on their own behalf or through a duly authorized person;
- (ii) "**complaint**": all those actions that reveal delays, inattentiveness or any other type of deficient performance observed in the rendering of the Branch's services; and
- (iii) "**claim**": all those actions that bring to light, with the intention of obtaining the restitution of its interest or rights, specific facts related to actions or omissions of the Branch that imply, for the person filing them, a detriment to its interests or rights and that derive from alleged breaches of applicable regulations.

### **2. DEADLINES FOR SUBMISSION AND RESOLUTION**

Customers may submit their complaints and claims within a maximum period of two years from the date on which they became aware of the facts giving rise to the complaint or claim.

The period for resolving complaints or claims shall be two months and shall be counted from the date on which the complaint or claim is submitted.

### **3. SUBMISSION OF COMPLAINTS AND CLAIMS**

Complaints and claims may be submitted on paper or by computer, electronic or telematic means, provided that these allow the documents to be read, printed and stored.

Customers may submit their complaint or claim to the **Compliance department of ODDO BHF SCA in charge of customer care services of the Spanish Branch (hereafter "the CCS")**:

Postal address:

**ODDO BHF SCA, Spanish Branch,  
Compliance department,  
Calle Marojal (Zelandia Building) 17,  
28050 Madrid, Spain**

Or electronically to:

[compliance@oddo-bhf.com](mailto:compliance@oddo-bhf.com)

The procedure will begin at the time the complaint or claim is submitted, which must include the following:

- name, surname and address of the person concerned (or company name and registered address in case of a legal entity); as well as the number of the national identity card, passport or foreigner identification number (or the corresponding information from the public register in case of a legal entity);
- reason for the complaint or claim, clearly specifying the aspects on which a decision is required;
- office, department or service involved in the facts to which the complaint or claim relates;
- a statement by the customer that, to the best of his or her knowledge, the matter to which the complaint or claim relates is not subject to any legal, administrative or arbitration procedure; and
- place, date and signature.

Together with the complaint or claim document, the customer shall provide the documentation that proves or supports the facts described in the complaint or claim.

#### **4. ADMISSION OF THE COMPLAINT OR CLAIM**

Within twenty-four hours of receiving the complaint or claim, the CCS will send its acknowledgement of receipt to the customer at the e-mail or postal address indicated, a number will be assigned to the complaint or claim and its date of submission will be expressly recorded, for the purposes of initiating the period for issuing a decision.

Complaints and claims may only be inadmissible for the following reasons where:

- they omit information essential to the handling of the complaint or claim and such information cannot otherwise be supplied, including cases where the reason for the complaint or claim is not clearly stated;
- the customer seeks to present as a complaint or claim a request or action which is a matter for judicial, administrative or arbitration bodies or which is pending resolution or procedure, or the matter has already been dealt with before any of these bodies;
- the facts, reasons and requirements relating to the matters dealt with in the complaint or claim do not relate to specific transactions or do not comply with the requirements set out in the Regulations;
- the issues raised in the complaint or claim have already been resolved in previous complaints and claims filed by the same customer concerning the same facts; or
- the time limit for submitting a complaint or a claim has expired.

When the complaint or claim is inadmissible for any of the above reasons, a reasoned explanation of the decision will be sent to the customer and the customer will be given ten calendar days to present their allegations. In the event that the complaint or claim remains inadmissible, the Branch will notify the customer of this circumstance. However, if the complaint or claim proves to be admissible, the procedure will be resumed and the period within which the admissibility of the complaint or claim has been assessed will not be included in the two-month period for resolving it.

## **5. SUBMISSION OF COMPLAINTS TO THE BANK OF SPAIN OR ANY OTHER SUPERVISORY AUTHORITY**

Customers may go to the Complaints Services of the Bank of Spain, the National Securities Market Commission (CNMV) if they have not received a response from the Branch's CCS within two months of their submission.

In addition, customers who have the status of "consumer" in accordance with Law 7/2017, of 2 November, which transposes into Spanish law Directive 2013/11/EU of the European Parliament and of the Council of 21 May 2013 on alternative dispute resolution for consumer disputes, have a maximum period of one year to go to the Bank of Spain's Department of Entities Conduct, from the date of submission of the complaint to the CCS.

### Banco de España Complaints Service

- Address : Calle Alcalá 48, 28014 Madrid
- Electronic service : [Banco de España form](#).

### Investor Advice Office of the Comisión Nacional del Mercado de Valores

- Address: Calle Edison 4, 28006 Madrid.
- Electronic service : [Comisión Nacional del Mercado de Valores \(Spanish Securities Market Regulator\) form](#).