

REGULATIONS OF THE CUSTOMER CARE DEPARTMENT OF ODDO BHF SCA, SPANISH BRANCH

INTRODUCTION	3
PART I GENERAL PROVISIONS	3
1. OBJECT	3
2. DEFINITIONS	3
PART II CUSTOMER CARE SERVICE	4
3. STRUCTURE, COMPOSITION AND TASKS	4
4. HEAD OF THE CCS	4
5. APPOINTMENT OF THE HEAD OF THE CCS	5
6. TERM FOR OFFICE OF THE ROLE OF HEAD	5
7. CAUSES OF INCOMPATIBILITY	5
8. CONFLICTS OF INTEREST	6
9. DUTY OF COOPERATION	6
PART III COMPLAINTS AND CLAIMS RESOLUTION PROCEDURE	6
10. DEADLINES FOR SUBMISSION AND RESOLUTION	6
11. SUBMISSION OF COMPLAINTS AND CLAIMS	6
12. ADMISSION OF THE COMPLAINT OR CLAIM	7
13. INVESTIGATION OF THE COMPLAINT OR CLAIM	7
14. RESPONSE	8
15. ACCEPTANCE AND WITHDRAWAL	8
16. SUBMISSION OF COMPLAINTS TO THE BANK OF SPAIN OR ANY OTHER SUPERVISORY AUTHORITY	8
PART IV OTHER PROVISIONS	9
17. RELATIONSHIP BETWEEN THE BRANCH AND THE BANK OF SPAIN	9
18. PUBLIC INFORMATION	9
19. ANNUAL REPORT	9
20. ENTRY INTO FORCE OF THE REGULATIONS AND OTHER AMENDMENTS	10

INTRODUCTION

Order ECO/734/2004, of 11 March 2004, on customer care departments and services and the advocate of the customer of financial institutions (the “**Order**”), establishes that entities are obliged to listen and resolve complaints and claims submitted by their customers in relation to their legally recognized interests and rights. For this purpose, these entities shall have a department or service specialised in customer care and regulations that regulate their activity.

This document establishes the policy and procedures that govern and regulate the activity of the customer care service (the “**CCS**”) of ODDO BHF SCA, Spanish Branch (the “**Branch**”), as well as those other policies and procedures that serve to address and resolve the complaints and claims submitted by its customers, in accordance with the provisions of the Order (the “**Regulations**”).

The Branch’s contact details for these purposes are those published from time to time on the Branch’s website.

PART I GENERAL PROVISIONS

1. OBJECT

The purpose of these Regulations is to regulate the right of the Branch’s customers to have their complaints and claims related to their recognized interests and rights addressed and resolved, as well as the means, bodies and procedures that the Branch has established to ensure the effective exercise of these interests and rights in accordance with the Order and the legal regulations in force.

2. 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.

PART II

CUSTOMER CARE SERVICE

3. STRUCTURE, COMPOSITION AND TASKS

The CCS will be composed of a head (the “**Head**”) and the auxiliary personnel that the Branch deems convenient from time to time, according to its needs and volume of activity.

The CCS will be separate from the rest of the operational and commercial units and divisions of the Branch and will make its decisions in a completely autonomous manner in the performance of its tasks.

The Branch shall ensure that the Head and the CCS have adequate human, material, technical and organizational resources to carry out their tasks.

The CCS will carry out the following tasks:

- a) to listen to and resolve the complaints and claims filed by customers pursuant to Part III of these Regulations;
- b) advise on and be responsible for the Branch’s compliance with the obligations arising from the rules on transparency and customer protection in financial services and best banking and financial practices, and prepare proposals and reports, either on its own initiative or upon request, on these issues;
- c) to ensure compliance with the reporting duties imposed by Article 9 of the Order;
- d) to respond to complaints and claims sent to the Branch’s complaints channel; and
- e) to draw up an annual report on the performance of its tasks, in accordance with the provisions of article 17 of the Order.

4. HEAD OF THE CCS

The Head will carry out the following tasks:

- a) to listen to and resolve all complaints and claims that may be filed by customers;
- b) supervise the flow of information between the business units and the CCS when a customer files a complaint or claim;
- c) analyse on an ongoing basis the type and nature of complaints and claims received, as well as make recommendations to improve relations between the customer and the Branch;
- d) monitor the process of handling complaints and claims to ensure that they are handled in accordance with the legal requirements in force;
- e) decide and manage the training of the auxiliary personnel of the CCS on its tasks related to the CCS. The Head shall ensure that they have adequate knowledge of the regulations on transparency and protection of customers of financial services;
- f) receive relevant communications from the Bank of Spain (“**BoS**”) related to customer claims, as well as forward any communications to the BoS; and
- g) to inform the General Manager of the Branch and any other bodies it deems relevant about the complaints and claims received and, in particular, to prepare the annual report on the functioning of the CCS.

5. APPOINTMENT OF THE HEAD OF THE CCS

The Head will be appointed by the General Manager of the Branch and will have an adequate training, as well as full knowledge of the duties he/she is assuming in such capacity. In order to be appointed as Head, the person concerned must meet the following requirements:

- a) commercial and professional suitability, i.e. has a personal record of respect for commercial, business and economic regulations. as well as good business and financial practices;
- b) adequate knowledge and experience, i.e. has necessary training or has carried out functions connected with the financial activity; and
- c) absence of conflicts of interest pursuant to article 8 of these Regulations.

The Branch shall notify the Department of Entities Conduct of the BoS, as well as the rest of competent authorities, if any, of the appointment of the person acting as the Head of the CCS at any given time in accordance with the terms provided for in the applicable regulations.

6. TERM FOR OFFICE OF THE ROLE OF HEAD

The term for office of the role of Head is for one year, automatically renewable each year unless otherwise notified by the Branch.

However, the General Manager of the Branch may decide to remove him/her from office if there is serious and justified cause and, in any case, when any of the following circumstances apply:

- a) loss of the eligibility requirements for the post;
- b) death or supervening incapacity;
- c) conviction of a criminal offence by an unappealable judgment;
- d) resignation;
- e) removal for negligence in the performance of his/her duties; or
- f) any other circumstance that may affect the Head's ability to perform his/her tasks, when this is notified by the General Manager of the Branch.

In any of the above cases, another person shall be appointed as Head.

7. CAUSES OF INCOMPATIBILITY

The following persons may not be appointed as a Head, nor perform its tasks:

- a) any person who has been disqualified in accordance with Royal Legislative Decree 1/2020, of 5 May, approving the consolidated text of the Law of Insolvency, insofar as the period of disqualification remains in force;
- b) any person who has been convicted of offences of, among others, forgery, tax fraud, punishable insolvency, money laundering or embezzlement; or
- c) any person who has been disqualified or suspended from holding public, administrative or corporate office pursuant to criminal or administrative proceedings.

8. CONFLICTS OF INTEREST

When the Head is found to be in a situation of conflict of interest in relation to a complaint or claim, either because it affects him/her directly or his/her direct relatives or relatives by affinity up to the third degree, or any other persons with whom he/she has a close relationship, he/she shall immediately inform the General Manager of the Branch.

In such cases, the Holder shall abstain from participating in the processing and resolution of the complaint or claim.

9. DUTY OF COOPERATION

The Branch shall adopt the necessary measures to guarantee the correct functioning of the CCS. In particular, the Branch shall ensure that all departments comply with the obligation to provide the CCS with all information necessary for the performance of its tasks and, in any case, any information which the CCS may request from time to time.

PART III

COMPLAINTS AND CLAIMS RESOLUTION PROCEDURE

10. 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.

11. 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 CCS, any branch office open to the public, by post and at the e-mail address set out on the Branch's website:

ODDO BHF SCA, Spanish Branch,
Compliance department,
Calle Marojal (Zelandia Building) 17,
28050 Madrid, Spain
compliance@oddo-bhf.com

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

- a) 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);
- b) reason for the complaint or claim, clearly specifying the aspects on which a decision is required;
- c) office, department or service involved in the facts to which the complaint or claim relates;
- d) 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
- e) 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.

12. 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.

In the event that any of the information indicated in article 11 of these Regulations has not been reliably provided, the Branch will request the customer to complete the documents within ten calendar days and will warn them that, if they do not complete the documentation, the file will be archived. However, the customer may provide the documentation after this period has elapsed, in which case a new procedure will be opened.

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

- a) 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;
- b) 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;
- c) 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 Article 11 of this Regulation;
- d) 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
- e) the time limit for submitting a complaint or a claim under Article 10 of these Regulations 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.

13. INVESTIGATION OF THE COMPLAINT OR CLAIM

When a complaint or claim is admitted, the CCS will be informed and will be responsible for determining its nature (including whether the customer has suffered any type of damage or financial loss), its causes and possible solutions.

Throughout the processing and investigation of the complaint or claim, the CCS may request customers and employees of the Branch to answer any questions they deem relevant or to provide the information necessary to process and investigate the complaint or claim in question.

The CCS will ensure that the circumstances that led to the complaint or claim being made are identified and rectified so that the same acts or omissions do not occur again.

14. RESPONSE

The CCS must resolve the complaints and claims submitted within two months from the date of their submission.

Failure to respond within this period does not in any way imply acceptance of the complaint or claim by the Branch. However, failure to respond gives the customer the right to turn to the complaints services of the financial supervisors.

As for the form of the CCS's response, this shall be in writing or by computer, electronic or telematic means, and, in any case, shall contain the following information:

- a) clear reasons and conclusions regarding the issue raised in the complaint or claim based on the contractual terms and applicable laws;
- b) investigations carried out during the handling of the complaint or claim;
- c) offer of compensation or corrective actions, where appropriate, which shall be binding to the Branch; and
- d) mention of the customer's right to refer to the complaints service of the relevant financial supervisor if they do not agree with the response received.

In said response, the CCS may:

- a) accept the complaint or claim and, where appropriate, offer compensation or remedies;
- b) not accept the complaint or claim, but offer compensation or remedies; or
- c) reject the complaint or claim, giving reasons for doing so.

The CCS's decision shall always be justified and shall contain clear conclusions on the request made in each complaint or claim, based on the contractual clauses, the applicable rules on transparency and customer protection, as well as good financial practices and usages. If the CCS's decision deviates from the criteria expressed in previous similar cases, reasons must be provided. The interested parties shall be notified of the decision within ten calendar days of the date on which it was issued, in writing or by computer, electronic or telematic means, provided that these allow the documents to be read, printed and stored and meet the requirements of Law 6/2020, of 11 November, regulating certain aspects of electronic trust services.

The resolution of the CCS will be binding for the Branch, but not for the claimant, who, in the event of accepting it, will not have to waive any subsequent right or instance in defence of his/her interests.

15. ACCEPTANCE AND WITHDRAWAL

If, in view of the complaint or claim, the Branch rectifies its situation with the customer to the latter's satisfaction, it shall notify the customer and provide documentary justification, unless the customer expressly withdraws. In such cases, the complaint or claim shall be closed without further action. Customers may withdraw their complaints and claims at any time. Withdrawal shall result in the immediate termination of the procedure as far as the relationship with the customer is concerned. However, the Head of the CCS may agree to continue with the procedure within the framework of its function of promoting compliance with the regulations on transparency and customer protection and good financial practices and uses.

16. SUBMISSION OF COMPLAINTS TO THE BANK OF SPAIN OR ANY OTHER SUPERVISORY AUTHORITY

Customers may go to the Complaints Services of the BoS, the National Securities Market Commission (CNMV) or the General Directorate of Insurance and Pension Funds (DGSFP) 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.

PART IV OTHER PROVISIONS

17. RELATIONSHIP BETWEEN THE BRANCH AND THE BANK OF SPAIN

The CCS shall be competent to deal with requests for information and any other communications made by the BoS's complaints service in the performance of its duties, within the deadlines established by the BoS in accordance with its own rules.

The Branch shall establish the relevant measures to facilitate the transmission of data and documents that may be necessary in its relations with the BoS's complaints service in accordance with the legislation in force at any given time.

18. PUBLIC INFORMATION

The CCS shall also be responsible for complying with its information obligations, as set out in the Order and, in general, in the rules on transparency and customer protection in financial services. The Branch shall ensure that the following information is available at its registered office, on the Branch's website or at all its offices open to the public:

- a) the existence of the CCS, its address and e-mail address;
- b) the obligation of the Branch to attend to and resolve complaints and claims submitted by its customers, within two months of their submission, in accordance with article 11 of these Regulations;
- c) a reference to the BoS complaints service, its address and e-mail address, as well as the need to end the procedure before submitting the complaint or claim to the aforementioned service;
- d) an updated and consolidated version of these Regulations; and
- e) references to the transparency and customer protection rules of these services.

19. ANNUAL REPORT

Within the first quarter of each year, the Head shall submit to the Branch General Manager a report on the performance of his/her duties and those of the CCS during the previous year. The report shall contain at least the following information:

- a) a statistical summary of the complaints and claims processed, with information on their number, admission for processing and reasons for rejection, grounds and issues raised in the complaints and claims, as well as the amounts and quantities involved;
- b) a summary of the decisions issued and an indication of whether they are favourable or unfavourable to the customer;
- c) general criteria contained in the decisions; and
- d) recommendations or suggestions derived from its experience, in order to better achieve the purposes for which it acts.

20. ENTRY INTO FORCE OF THE REGULATIONS AND OTHER AMENDMENTS

These Regulations have been approved by the General Manager of the Branch and may only be amended by him/her. Any amendment to the Regulations must be in accordance with the rules on transparency and protection of customers of financial services applicable from time to time.

Likewise, the current version of these Regulations and any subsequent amendments approved by the Branch General Manager shall be submitted to the BoS for its verification.

In this respect, any complaint or claim submitted by customers prior to the date on which the aforementioned amendments are approved shall be dealt with in accordance with the version of the Regulations in force at the time the complaint or claim in question was submitted.

* * *