novobanco

POLICY FOR HANDLING COMPLAINTS

June 2026

Novo Banco, S.A. is a company owned by BPCE SA.
Registered Office: Campus do novobanco, Avenida Doutor Mário Soares, Taguspark, Edifício 1, 2740-119 Porto Salvo, Portugal
Sole legal entity/Lisbon Commercial Registry Office registration no. 513 204 016
Share capital of €2,245,000,000.00 – Swift Address – BESCPTPL

GROUPE BPCE

1. Introduction

The existence of a Complaints Handling Policy is a factor that lends credibility to the Bank, since it allows any complaint or expression of dissatisfaction received from customers or non-customers to be evaluated. This helps restore satisfaction and constantly improve the quality of the service provided.

Any Complaints Handling Policy must allow the grounds for the complaint to be evaluated, together with the Bank's response, and identify the causes of customer dissatisfaction, with a view to continuously improving the commercial relationship with the Bank, through the provision of products and services being marketed.

As such, the aim of this policy is to define the principles adopted by novobanco, within the framework of its relationship with customers or third parties, in all phases of the complaints management process, which is supplemented by an internal procedural guideline (NG 0068/2022).

This policy was drawn up in compliance with the applicable provisions and regulations for handling processes in a diligent, effective and impartial manner, resolving situations and acting in a diligent and rigorous manner.

A “complaint” is defined as any expression of a problem, submitted in a durable medium by a customer, a non-customer or their representative, relating to the bank’s services.

“Dissatisfaction/suggestion” is defined as a situation, submitted in a durable medium by a customer, a non-customer or their representative, which may entail a proposal for improvement.

2. Principles of the Complaints Handling Policy

2.1 To give **novobanco** customers the unlimited opportunity to file complaints about the actions of the Bank, its employees or agents. **novobanco** will also receive expressions of dissatisfaction, which will be given the same consideration as any complaint.

2.2 Complaints (or expressions of dissatisfaction) may be presented to the Bank by the means defined and identified in point (3) of this policy, entirely free of charge, in the account opening contracts, on its website and, under the terms of the law, at its physical premises. It identifies the supervisory entities that will be notified, namely Banco de Portugal, the Portuguese Securities Market Commission (CMVM) and the Insurance and Pension Funds Supervisory Authority (ASF), and explains the use of the physical and electronic Complaints Book.

2.3 **novobanco** will separate out the phases of analysing and responding to complaints received, together with the areas or persons in charge, and seek independent handling in relation to the area involved in the complaint in a transparent, objective and balanced manner.

2.4 In the responses to complaints by the Regulatory Bodies, the legal and regulatory deadlines defined are guaranteed, according to the input channels used.

Banco de Portugal: the statutory response time for complaints recorded in the Complaints Book or the Electronic Complaints Book is 15 working days.

Portuguese Securities Market Commission (CMVM): the statutory response time for complaints recorded in the Complaints Book, the Electronic Complaints Book, or complaints submitted directly to the CMVM is 15 working days.

Insurance and Pension Funds Supervisory Authority (ASF): the statutory response time for complaints recorded in the Complaints Book, the Electronic Complaints Book, or submitted directly is 15 working days.

2.5 All remaining complaints will be answered by **novobanco** within a period not exceeding 20 days. The responses shall be provided in simple, clear language, which is easy for customers to understand and duly justified, in written format addressed to the complainant, either by letter or e-mail.

2.6 Complaints must include at least the following information:

- Full name of the complainant and, where applicable, of the person representing them (including the document granting powers of representation);
- Indication of the complainant's capacity, whether as customer or non-customer, injured third party, or as a person representing them;
- Contact details of the complainant (per information provided to novobanco) and, where applicable, of the person representing them;
- Identity document number of the complainant;
- Description of the facts giving rise to the complaint, identifying the parties involved and the date when the events took place, unless it is impossible to provide;
- Date and place of the complaint;
- Any other information deemed relevant by the complainant.

3. Complaints Handling Policy

3.1 Any complaints received by novobanco will be handled in accordance with the principles of **equity, rigour, diligence and transparency**, ensuring that customers are treated fairly, in particular by striking a balance between the interests of complainants and those of the Bank, and by ensuring that decisions are consistent, impartial and duly substantiated.

3.2 After receiving the complaint or expression of dissatisfaction, novobanco takes the necessary steps to ascertain and assess the facts alleged by the complainant. It carefully and impartially analyses the information and documentation available, in conjunction with the internal areas of the Bank responsible for the whole process of supporting the provision of products and services which are the subject of the complaint presented.

novobanco will confirm receipt of the complaint to the complainant, thereby guaranteeing transparency from the very outset of the process.

Where appropriate, depending on the complexity or duration of the review process, novobanco may provide interim updates to the complainant to keep them informed of the case's progress, and to encourage clarity and openness in the relationship.

If a final response cannot be given within the established statutory or internal time limits, novobanco may inform the complainant of this via an appropriate notice of the case's status and the steps being taken.

3.3 The Bank's position with regard to each process shall be formally notified to the individual who filed the complaint.

3.4 novobanco keeps a record of each complaint. This consists of a complete file containing its analysis, decision and response, which will be kept accessible to supervisory entities for the legally stipulated periods.

3.5 As part of its complaints management process, **novobanco** ensures compliance with applicable legal and regulatory provisions on the protection of personal data, in particular those arising from the General Data Protection Regulation and relevant national legislation.
All personal data are processed lawfully, fairly and transparently, and are limited to what is strictly needed to analyse, manage and resolve complaints.

novobanco complies with its information obligations and, where applicable, obtains consent from data subjects, whilst also ensuring the security, confidentiality and integrity of information processed.

The Data Protection Policy (PL 0019/2022) applies for the purposes of providing a detailed framework.

3.6 The complaints management department ensures the ongoing monitoring of cases, guaranteeing, in particular:

- Daily monitoring of applicable regulatory deadlines.
- Regular reporting to the Board of Directors and Compliance Department as part of the compliance function.
- Coordination with the Bank's internal control, risk management and third-line-of-defence functions.

4. Channels for submitting Complaints

4.1 Complaints from customers and non-customers may be submitted to novobanco via the following channels:

By post	**novobanco**, Customer Experience and Satisfaction Office – Complaints Management – Avenida Doutor Mário Soares, Taguspark, Edifício 1, 2740 – 119 Porto Salvo
In person, at	any **novobanco** branch
By telephone	707 24 7 365
By Internet	www.**novobanco**.pt
By email	satisfacao@novobanco.pt
By using the Complaints Book, available at any branch of novobanco, during opening hours	
By using the consumer conflict mediation resources referred to in point (5).	
Through the direct use of the regulatory authorities, Banco de Portugal, the Portuguese Securities Market Commission (CMVM) or the Insurance and Pension Funds Supervisory Authority (ASF), or through the electronic complaints book, available at *www.livroreclamacoes.pt/inicio* or through the link also available on the **novobanco website**.	

4.2 At the time of filing the complaint, the customer may review a copy of this Policy to have a clear idea of the available tools and subsequent process.

5. Alternative Dispute Resolution

5.1 If you do not agree with the Bank's response or the proposed solution, you may seek alternative dispute resolution.

5.2 In the event of a consumer dispute, the customer may resort to one of the following Arbitration Centres of which novobanco is a member, and which are part of the Consumer Arbitration Network

- *National Centre of Information and Arbitration for Consumer Conflicts (CNIACC)* *https://www.cniacc.pt/pt/*
- *Porto Arbitration and Consumer Information Centre (CICAP)*
- *https://www.cicap.pt/*
- Lisbon Consumer Conflict Arbitration Centre (CACCL) *http://www.centroarbitragemlisboa.pt/.*

The list and contact details of these bodies are made available by the Directorate General for the Consumer on the Consumer Portal (*www.consumidor.pt*).

5.3 In the event of a consumer dispute regarding contracts concluded online, the customer may appeal to the Electronic Platform for Online Dispute Resolution (RLL) or the alternative consumer dispute resolution body for their place of domicile.

5.4 Notwithstanding other resources available to them, complainants may also refer their case to the Credit Intermediary, an independent body operating under the auspices of Banco de Portugal.