GamaLife

INFORMATION ON COMPLAINTS MANAGEMENT AND CUSTOMER TREATMENT POLICY

Complaint – A complaint is any expression of disagreement with the position taken by the Insurance Company or dissatisfaction with the services it provides, as well as any allegation of potential non-compliance submitted by Customers. Customers are policyholders, insured persons, beneficiaries or injured third parties. The following are not included in the definition of a complaint: statements made during contractual negotiations; formal notices for compliance with legal or contractual obligations; communications relating to the claims settlement process; and any requests for information or clarification.

I – COMPLAINTS ADDRESSED TO GamaLife – Companhia de Seguros de Vida, S.A.

1 – Point of contact:

Complaints may be submitted via:

- Letter addressed to GamaLife – Companhia de Seguros de Vida, S.A. - Customer Service and Complaints Management. Address: Avenida Columbano Bordalo Pinheiro 75 – 11º andar, 1070-061 Lisbon
- Email: satisfacao@novobanco.pt
- Landline phone: (+351) 213 167 500 (Call to the national landline network - cost depends on the customer's contract with their teleco mmunications provider.)

The Electronic Complaints Book is also available on the insurer's website at www.gamalife.pt, under "Important Information for Customers" >> General Information on Complaints.

Notwithstanding the above, complaints relating to matters concerning GamaLife – Companhia de Seguros de Vida, S.A., duly submitted in writing on a durable medium (preferably digital), or by any other mea ns that allows for a written or recorded record, may also be lodged wi th the distribution channels through which the Insurance Company op erates.

For further information, please visit the link www.gamalife.pt >> Important information for customers, or call the following number:

- National: (+351) 707 247 365
- International: (+351) 218 557 753

(**) Cost of €0.09/min from a landline and €0.13/min from a mobile network, plus VAT at the applicable rate.

2 – Minimum requirements for a complaint:

a. Submission in writing on a durable medium, preferably in digital format, or by any other means that provides a written or recorded record;
b. Indication of the claimant's capacity, whether as policyholder, insured person, beneficiary, injured third party, and/or as a person representing them;
c. Contact information for the complainant and, when applicabl e, their representative;
d. Complainant's identification document number (ID card/Citizen's Card/Passport);
e. Taxpayer identification number;
f. Contract details (policy number/claim reference number);
g. Insurance classification, category or product type (e.g. auto, health, personal accident, etc.);
h. 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;
i. Date and place of the complaint.

If the complaint does not contain the items required for its proper handling, the Insurer will inform the complainant so that the missing information may be provided.

3 – The insurer undertakes to acknowledge receipt of the complaint within 5 working days of receipt and when foreseeable, inform the complainant of any difficulty in meeting the standard response deadlines as well as indicate the estimated date for completion of case review.

4 - A written response to the complaint will be provided within a maximum of 20 working days from the date of receipt of the complaint, provided that the minimum requirements set out in the previous point have been met. This time limit may be extended to 30 working days for particularly complex cases.

II – COMPLAINTS ADDRESSED TO THE OMBUDSMAN

Only complaints that have already been reviewed by the Insurer's complaints department may be submitted to the Ombudsman.

Complaints are eligible for submission to the Ombudsman if they were previously submitted to the Insurer and no response has been received within a maximum of 20 working days (the time limit is 30 working days in particularly complex cases), or if a response was provided but the complainant disagrees with its outcome.

1. Ombudsman: Luís Miguel Serradas de Sousa Tavares
   Address: Apartado 24048-Loja CTT Campo de Ourique (Lisbon) - 1251-997 Lisbon.

2. Email: serradas.tavares-9102l@adv.oa.pt Further information at: www.gamalife.pt
3. Minimum requirements:
   a. Full identification of the complainant (full name and identification document number) and if applicable, their representative's;
   b. Indication of the claimant's capacity, whether as policyholder, insured person, beneficiary, injured third party, and/or as a person representing them;
   c. Contact information for the complainant and, when applicable, their representative;
   d. Description of the facts giving rise to the complaint, identifying the parties involved and the date when the events took place, when possible;
   e. Explanation of the circumstances that led to the complaint being submitted to the Ombudsman.
4. A written response to the complaint will be provided within a maximum of 30 working days (the maximum response time is 45 working days in particularly complex cases).

III – RIGHT TO NOT ACCEPT A COMPLAINT

GamaLife – Companhia de Seguros de Vida, S.A. and the Ombudsman reserve the right to not accept a complaint, in accordance with the regulations in force, in the following circumstances:

i. Essential information is missing and has not been corrected, thereby preventing proper handling;
ii. If you wish to lodge a complaint regarding a matter that falls within the jurisdiction of arbitral or judicial bodies, or if the matter has already been resolved by such bodies;
iii. The complaint repeats a previous complaint submitted by the same complainant on the same matter, for which a response has already been provided by the relevant entity;
iv. The complaint was not made in good faith or its content is considered vexatious;
v. If the insurer becomes aware that the matter is pending litigation before arbitral or judicial bodies, it may refrain from continuing the complaints-handling process.

IV – OTHER ENTITIES WHERE THE COMPLAINTS MAY BE SENT

Insurance and Pension Fund Supervisory Authority (ASF) – Avenida da República, 76, 1600-205 Lisbon.

You also have the option of recourse to arbitration or the courts, in accordance with the legal provisions in force.

CUSTOMER TREATMENT POLICY REGULATIONS

Please note that the Insurer has a Customer Treatment Policy, available on the distribution channel's website and on the Insurer's website at www.gamalife.pt >> Important Information for Customers, which may be requested at any time and provided on paper if so desired.

REPORT ON THE INSURER'S SOLVENCY AND FINANCIAL POSITION

In accordance with current legislation, from 2017 onwards you may view the report on the insurer's solvency and financial position, as at the end of the immediately preceding financial year.
The report is available at www.gamalife.pt.

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GamaLife - Companhia de Seguros de Vida, S.A.
Registered Office: Av. Columbano Bordalo Pinheiro, 75 - 11º - 1070-061 Lisbon
Apartado 24048, Loja CTT Campo de Ourique (Lisbon) • 1251-977 Lisbon • Tel: (+351) 21 316 75 00
Share capital: €50,000,000 • Registered at the Commercial Registry Office of Lisbon and NIPC (Corporate Tax Identification Number): 503 024 856

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DOS AÇORES

SPECIAL INFORMATION OBLIGATIONS FOR INSURANCE INTERMEDIARIES – NOVO BANCO DOS AÇORES, S.A.

1) Identification and address of the Intermediary	NOVO BANCO DOS AÇORES, S.A. (the ‘Bank’), with its registered office at R. Hintze Ribeiro, 6 – 8 – 9500-049 Ponta Delgada.
2) ASF registration number and date	The Bank is duly authorised by the Insurance and Pension Funds Supervisory Authority (ASF) to sell life and non-life insurance. It has been registered as an Insurance Agent under no. 419552824 since 21 January 2019. This information is available on the Insurance and Pension Funds Supervisory Authority website at www.asf.com.pt
3) Qualified shareholdings in Insurance Companies and Pension Fund Management Companies	The Bank does not have any direct or indirect shareholdings in Insurance Companies or Pension Fund Management Companies.
4) Qualifying shareholdings in the Intermediary held by Insurance Companies or by Parent Companies of Insurance Companies	No Insurance Company or Parent Company of an Insurance Company has any qualifying shareholdings in the Bank’s share capital.
5) Insurance Companies and Pension Fund Management Companies the Bank is authorised to work with	**Life Insurance:** · GamaLife – Companhia de Seguros de Vida, S.A. · Generali Seguros, S.A. · GNB – Sociedade Gestora de Fundos de Pensões, S.A. **Non-Life Insurance:** · Mudum – Companhia de Seguros, S.A. · Generali Seguros, S.A. · Europ Assistance, Companhia Portuguesa de Seguros de Assistência, S.A. · Coface, S.A.
6) Authorisation to receive premiums for remittance to the Insurer	The Bank is not authorised to receive insurance premiums for remittance to the Insurer.
7) Intervention of the Intermediary in Insurance Contracts and individual accessions to Pension Funds	The Bank’s involvement includes providing assistance throughout the duration of the insurance contract or individual accession to a pension fund, namely by offering clarification and resolution of complaints.
8) Nature of the Remuneration received in connection with the insurance contract	- Financial Life Insurance For its role as an intermediary acting as an Insurance Agent, the Bank will be remunerated with a percentage of the fees for underwriting, management and redemption/surrender charged by the Insurer, where such fees apply, in accordance with the relevant General and Special Terms and Conditions and the respective pre-contractual information. - Pension Funds For its role as an intermediary, the Bank receives a percentage of the management fee charged by the Pension Fund Management Company, in accordance with the respective Management Regulations. - Risk Life Insurance For its role as an intermediary, the Bank will be paid a commission based on a portion of the insurance premium, which may vary depending on the volume of premiums, policies and/or performance. - Non-Life Insurance For its role as an intermediary, the Bank will be paid a commission based on a portion of the insurance premium, which may vary depending on the volume of premiums, policies and/or performance.
9) Right to information regarding Remuneration	The Customer has the right to request information on the remuneration the Bank will receive for providing insurance distribution services.

NOVO BANCO DOS AÇORES, S.A.
Registered Office: Rua Hintze Ribeiro, nºs 2 a 8, em Ponta Delgada, with share capital of 18,637,500.00 Euros, registered with the Ponta Delgada Commercial Registry Office under registration and legal entity no. 512 061 840

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10) Complaints and Alternative Dispute Resolution	If the Customer or any other interested party wishes to exercise any of their legally recognised rights in relation to their personal data, or to submit a complaint, they should contact: • By post: Novobanco, Gabinete de Experiência e Satisfação de Cliente – Gestão de Reclamações – Avenida da Liberdade, 195 - 11º PISO, 1250 – 142 Lisbon By email: satisfacao@novobanco.pt or online form; • By telephone: **21 883 77 00** (call to a domestic landline - cost agreed between the customer and their telecommunications provider) or **707 247 365** (cost of €0.09/min from a landline and €0.13/min from a mobile network, plus VAT at the prevailing rate), with personalised service on working days from 8am to 10pm and on weekends and public holidays from 9am to 6pm. • Via the website: www.novobancodosacores.pt; • In person at any Bank branch; • Using the Complaints Book, at any Bank branch, during normal business hours; • Via the Electronic Complaints Book: (www.livroreclamacoes.pt/inicio); • Through the consumer dispute-resolution bodies listed on the Bank's website, under point 6 of the Bank's Complaints Handling Policy. You may also address your complaints to the **Insurance and Pension Funds Supervisory Authority (ASF)** – Av. da República, 76, 1600-205 Lisbon Telephone: (351) 21 790 31 00 Fax: (351) 21 793 85 68 *Email*: asf@asf.com.pt Information Line: 808 787 787 217 983 983 Business hours: 9am to 4pm Without prejudice to the right to bring proceedings before the courts, in the event of a dispute arising from insurance distribution activities, consumers may refer the matter to the alternative dispute resolution entities indicated in point 6 of the Bank's Complaints Handling Policy, available on the Bank's website under *Suggestions and Complaints*.
11) Proposed contract – Insurance Companies and/or Intermediaries	The insurance intermediary agreement will be entered into with one of the Insurance Companies or Pension Fund Management Companies that the Bank is authorised to work with.
12) Role of the Insurance Inter mediary	When distributing insurance contracts, the Bank acts in the name and on behalf of the Insurance Companies and Pension Fund Management Companies it is authorised to work with (see point 5 above).
13) Advising	The Bank may advise on Financial Life insurance products and Pension Funds, as part of its non-independent, non-impartial and non-personalised advisory service, in relation to insurance contracts and insurance-based investment products.
14) Personal Data Processing	All personal data is processed by the Bank in accordance with the General Data Protection Regulation, other applicable legislation and the Personal Data Processing Information provided to you. This information is available at any time at www.novobanco.pt.

GamaLife

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SUSTAINABLE AND RESPONSIBLE INVESTMENT.

GamaLife operates with the aim of optimising the balance between risk and return while minimising, as far as possible, factors that may pose a significant risk to the environment or to society. As such, GamaLife incorporates Environmental, Social and Governance (ESG) criteria into its investment decisions, favouring assets with supported by long-term sustainable business models.

As part of its Investment Policy and as part of its responsible investment approach, GamaLife has established an exclusion policy for the investments it makes. Investment is currently prohibited in companies whose main business activities include: coal mining, the manufacture and sale of conventional and controversial weapons, adult entertainment; gambling, and tobacco production. Furthermore, investment in companies and countries subject to international sanctions related to human rights violations is not permitted. In any requirement is not met, GamaLife will take the necessary steps with the relevant management entities to ensure that the situation is rectified in a manner consistent with the economic principles of sound and sustainable management.

GamaLife considers that, in the case of existing products, sustainability risks are not the most significant factors, as the underlying investment decisions are not intended to promote environmental and/or social characteristics, nor do they pursue sustainable investment objectives for the purposes of Articles 8 and 9 of Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019.

GamaLife publishes its policies and statements on sustainability on its website (www.gamalife.pt) which together provide the framework for the Company's socially responsible investment model.

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