UTMOST WEALTH PORTUGAL, UNIPESSOAL, LDA.

CUSTOMER HANDLING POLICY

Policy reference: UWP CH

Last Review Date: May 2026
Next Review Date: Q2 2027

POLICY SUMMARY

Title	Customer Handling Policy
Policy type	Local policy, in accordance with Portugal's regulatory requirements, imposed by the Portuguese insurance regulator, the Insurance and Pension Funds Supervisory Authority (ASF).
Approved by	Management of Utmost Wealth Portugal, Unipessoal, Lda. ("UWP")
Last Review Date	May 2026
Next Review Date	Q2 2027
Local policy owner	Managing Director of Utmost Wealth Portugal ("UWP")
Policy location	Utmost Wealth Portugal Intranet UWP Portuguese Website – https://utmostinternational.com/wealth-solutions/our-wealth-solutions/portugal/our-solutions-portugal-en

VERSION CONTROL

VERSION	DATE	DETAILS	BY	COMMENTS / APPROVAL
1.0	16/06/2026	New local document	Natalia Valverde Vaquero (Head of Regulatory Compliance of ULux)	Pedro Paixão - Head of Utmost Wealth Portugal

Related Documentation

Group Legal Risk Policy

UWP Conflict of Interest Prevention Policy

UWP Insurance Distribution Procedure

1. INTRODUCTION AND SCOPE

1.1. INTRODUCTION

This document ("Policy") sets out the principles defined by Utmost Wealth Portugal, Unipessoal, Lda. ("UWP"), registered with the Portuguese Insurance and Pension Funds Supervisory Authority ("ASF") as an insurance agent, within the framework of its relationship with Customers.

This Policy does not supersede other internal UWP procedures or requirements, which may apply simultaneously in accordance with the internal organization procedures defined by UWP from time to time.

This Policy results from specific regulatory requirements applicable to UWP under Portuguese law and regulation. Any matters not specifically set forth herein shall be governed by the applicable Utmost Group policies.

1.2. REGULATORY CONTEXT

This Policy is based on the legal and regulatory framework arising from article 24, number 1, paragraph t) of the Legal Framework for the Distribution of Insurance and Reinsurance, approved by Law No. 7/2019, of January 16 ("RJDS") and article 32 et seq. of ASF Regulatory Standard No. 13/2020-R, of December 30.

1.3. RESPONSIBILITY

This Policy is the responsibility of UWP management, who is responsible for properly defining, approving, and implementing the rules set forth herein, as well as monitoring their compliance.

Under the applicable regulatory terms, UWP management is responsible for:

- Ensuring that this Policy considers the insurance distribution channels used, ensuring that the principles, rules and procedures adopted within the framework of the respective relationship with Customers are extended to them;
- Ensuring that this Policy is effectively communicated to all Employees in the area of insurance distribution and that it is permanently available and accessible through internal disclosure;
- Ensuring that this Policy is disclosed to the public by appropriate means, by posting it on UWP website, as well as, where requested, by delivering it on paper or other durable media;
- Ensuring that this Policy is properly implemented and monitored, taking into account the guidelines of the Utmost Group in everything that does not prove to be incompatible with the regulatory requirements established by the ASF.

1.4. RECIPIENTS

This Policy covers members of UWP's management, as well as all UWP employees and collaborators, covering all distribution channels used, who perform insurance distribution tasks that may involve relationships with Customers (hereinafter, all generically referred to as "Employees").

1.5. DEFINITIONS

For the purposes of this Policy, the terms and definitions given below have the meaning set forth below:

- Customers: policyholders, insured persons, beneficiaries or injured third parties.

2. REGULATORY REQUIREMENTS

2.1. FAIRNESS, DILIGENCE AND TRANSPARENCY

All Customers are guaranteed equitable, diligent and transparent treatment, with a view to satisfying their requests and needs and respecting their rights.

2.2. INFORMATION AND CLARIFICATION

Employees must, in the exercise of their duties, ensure that Customers, taking into account their profile and the nature and complexity of the situation, are delivered the information as required by law and provided adequate clarification with a view to allow Customers to make informed decisions in the context of contracting or underwriting insurance products.

Employees are bound to comply with the rules set forth by UWP in its Insurance Product Distribution Policy, which sets out the internal mechanisms implemented by UWP to ensure that the insurance products marketed are tailored to the profile and needs of Customers.

Communications with Customers, whatever their medium, must be written in a clear and easily intelligible manner, reducing interpretation doubts to a minimum. This principle extends to all support material for the placement of insurance, namely, insurance proposals, information notes, brochures and other promotional or advertising material, when applicable.

UWP ensures the appropriate qualification of Employees who are involved in insurance distribution tasks that may involve the relationship with Customers.

2.3. PREVENTION AND MANAGEMENT OF CONFLICTS OF INTEREST

Employees must avoid and be aware of any situation that may directly or indirectly lead to a conflict of interest with Customers in their day-to-day lives. All Employees must proceed in order to prevent the occurrence of conflicts of interest with Customers, namely in the context of complaint management.

A conflict of interest exists whenever Employees have a personal or private interest in a particular matter or activity that may influence, or appear to influence, and may interfere, or is likely to interfere, with the impartial, upright and objective performance of their duties or the ability to act in the best interest of Customers. Personal or private interest is understood to be any potential advantage, patrimonial or non-patrimonial, for the Employee himself/herself, for his/her family members or relatives or other persons, related to him/her.

When a potential conflict situation is identified, Employees are obliged to immediately report such situation under the terms of UWP Conflict of Interest Prevention Policy, refraining from intervening in such situations without instructions in this regard.

The specific measures implemented by UWP to prevent and manage conflicts of interest are proportionate to the size and activity carried out by UWP and are set out in UWP's Conflict of Interest Prevention Policy. In general terms, the following methodology is applied:

1) Identification;
2) Evaluation / quantification (risk assessment);
3) Mitigation; and
4) Monitoring.

2.4. SPEED AND EFFICIENCY

Employees must perform the functions or tasks that are their responsibility, with accuracy and quality, with a view to a quick and efficient management of processes related to Customers, namely in terms of claims and complaints.

2.5. PROCESSING OF PERSONAL DATA AND CONDITIONS OF ACCESS TO INFORMATION

The processing of Customers' personal data is carried out in strict compliance with the applicable legal regulations and the security rules, of a technical and organisational nature, appropriate to the risk that the processing of the data presents.

Customers may have access to information concerning them, requesting its correction, addition or deletion, by contacting UWP directly or in writing through the following contacts:

Address: Avenida da República n.º 57, 6.º, 1050-189 Lisbon, Portugal

Emails:

- Generic contact - contact.pt@utmostgroup.lu
- DPO matters - dpo.pt@utmostgroup.lu

UWP Employees are required to maintain strict confidentiality about all facts and/or information regarding Customer data that they become aware of in the performance of their duties.

The rules and principles implemented by UWP regarding the protection of personal data are defined in UWP Privacy and Personal Data Processing Policy, available at https://utmostinternational.com/privacy-statements

3. COMMUNICATION, MONITORING AND CHANGES

3.1. COMMUNICATION OF THIS POLICY

This Policy is communicated internally to all UWP Employees.

This Policy is made public via UWP website (https://utmostinternational.com/wealth-solutions/our-wealth-solutions/portugal/our-solutions-portugal-en), and is also available in paper or durable format, upon request of the interested party.

3.2. MONITORING AND CHANGES TO THIS POLICY

UWP monitors this Policy and revises it as necessary.

Approval of this Policy, as well as any revisions and changes to it, is made by UWP management.

3.3. EFFECTIVE DATE

This Policy, and its subsequent versions, shall enter into force on the day immediately following its approval.