

# OCTIUM

## Complaints Management Policy

### 1. Introduction

Complaints are processed through our internal procedure which involves initial assessment, investigation, and resolution.

### 2. How do I file a complaint?

You have several difference options for filing a complaint as outlined below.

#### 2.1. Submit your complaint to Octium Life DAC

Customers should submit their complaints in writing, either via email, or physical mail via:

- Email: [Info.IRL@octiumgroup.com](mailto:Info.IRL@octiumgroup.com)
- Post: Ms. Ruth Quinn, Octium Life DAC, College Park House, South Frederick Street, Dublin 2, Ireland.
- Electronic Complaints Book: [Home \(livroreclamacoes.pt\)](#)

The complaint should include:

- Full name and contact details of the complainant
- Policy number
- Detailed description of the complaint
- Any supporting documents or evidence

If a complaint lacks necessary information, the complainant will be notified and invited to provide the missing details. This must be done within 20 Business days.

Complaints may be rejected if:

- Essential data is omitted and not corrected within 20 Business days.
- The matter falls under the exclusive jurisdiction of arbitral or judicial bodies or is pending/decided by those bodies.
- The complaint is a repeat of a previously answered issue by the same complainant.
- The complaint is not submitted in good faith or is vexatious.

We aim to resolve concerns immediately and at the first point of contact. If we are unable to do so, an acknowledgement letter will be sent within 5 Business days of receiving the complaint. We will also provide you with a specific point of contact in Octium Life DAC.

Octium Life DAC will investigate any complaint submitted and provide the complainant with a qualified answer within 20 Business Days from the date of receipt which can be extended to a maximum of 30 Business Days for cases deemed particularly complex.

Complaints submitted through the Electronic Complaints Book will be answered within 15 Business Days.

#### 2.2. Submit your complaint to the Customer Ombudsman

The Customer Ombudsman appointed by Octium Life DAC was chosen, among other persons, for her recognized qualifications, suitability and independence.

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The Customer Ombudsman assessment of complaints does not affect the right of recourse to the courts or mechanism for the out-of-court settlement of disputes, including those relating to cross-border disputes.

Complaints previously submitted to Octium Life DAC can be submitted to the Customer Ombudsman in the following cases:

- when you have not received a response within 20 Business days (or 15 Business days when the complaint is submitted through the electronic complaint book) or 30 Business days in complex situations, or
- when you do not agree with the answer given by Octium Life DAC.

You may address your complaint to the Customer Ombudsman through the following contact details:

Name: Ms. Maria Elisabete Gomes Ramos

Address: Av. D. João II, N.º 20 – 1.º Andar, 1990-095 Lisboa, Portugal

Email address: [provedordoclienteoctium@gmail.com](mailto:provedordoclienteoctium@gmail.com)

Complaints submitted to the Customer Ombudsman shall be replied to in writing, with the respective assessment, within 30 Business days or, in more complex cases, within 45 Business days.

For more details, please consult the Regulation of the Customer Ombudsman in Annex I of this Complaint Management Policy.

Recommendations of the Customer Ombudsman regarding complaints managed by Octium Life DAC will be disclosed on our website.

### **2.3. Other alternatives for filing complaints**

You may also refer the complaint to the Financial Services and Pensions Ombudsman in Ireland. You may contact the following:

Financial Services and Pensions Ombudsman (FSPO)

Lincoln House

Lincoln Place

Dublin 2, Ireland

Tel: +353 (0) 1 567 7000

Email: [info@fspoi.ie](mailto:info@fspoi.ie)

[www.fspoi.ie](http://www.fspoi.ie)

You may also file a complaint to the following entities, without prejudice to recourse to the judicial Courts:

- Central Bank of Ireland, at New Wapping Street, North Wall Quay, Dublin 1, D01 F7X3, Ireland; or
- Autoridade de Supervisão de Seguros e Fundos de Pensões, at Avenida da República, 76, 1600-205 Lisboa.

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## **CUSTOMER OMBUDSMAN REGULATION OCTIUM LIFE DAC**

Referred to in Article 158 of Law No. 147/2015, of 09 September and  
Article 14 of the Regulatory Standard No. 7/2022-R, of 7 June

### **Chapter I General Provisions**

#### **Article 1 (Identification and contacts)**

In accordance with Article 158 of the Legal Regime of Access and Exercise of the Insurance and Reinsurance Activity (Law No. 147/2015, of September 9), Octium Life DAC (the “**Insurance Company**”), with registered office at College Park House, South Frederick Street, Dublin 2, Ireland, operating in Portugal under the freedom to provide services and recorded in such capacity with the Register of the Portuguese Supervisory Authority, the Autoridade de Supervisão de Seguros e Fundos de Pensões (the “**ASF**”) under number 5129, has appointed the following Customer Ombudsman:

Name: Ms. Maria Elisabete Gomes Ramos

Address: Av. D. João II, N.º 20 – 1.º Andar, 1990-095 Lisboa, Portugal

Email address: provedordoclienteoctium@gmail.com

#### **Article 2 (Mandate)**

1. The Ombudsman's mandate is for one year, renewable successively for equal periods of time.
2. The Insurance Company and the Customer Ombudsman may terminate the mandate at any time, and without any justifiable reason by means of a written communication at least 45 (forty-five) days prior to the termination date.
3. The Ombudsman's duties shall cease in the event of death or permanent physical impossibility, supervening incompatibility or in the event of termination due to serious or repeated failure to fulfil the legal and regulatory obligations inherent in the role of Customer Ombudsman.

#### **Article 3 (Functions)**

1. It is the duty of the Customer Ombudsman to consider all complaints addressed by policyholders, insured persons and beneficiaries, concerning acts or omissions of the Insurance Company, provided that they have not been resolved by the Complaints Committee of the Insurance Company.

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2. The Customer Ombudsman performs its duties with complete independence and impartiality.
3. The Customer Ombudsman prepares and promotes, every year, the disclosure of the Ombudsman's Report, describing the recommendations made to the Insurance Company and their degree of acceptance. This Customer Ombudsman Report will be sent to both the Insurance Company in English and the ASF in Portuguese.
4. The Customer Ombudsman and those working in collaboration with him are bound to a duty of confidentiality concerning the facts that come to their knowledge during the performance of their duties.

## **Article 4 (Conflict of Interest)**

1. The Customer Ombudsman shall immediately inform the Insurance Company of any circumstance that may jeopardise its independence and impartiality in the exercise of its duties, notably those detailed in Article 13, number 3, of the Regulatory Standard No. 7/2022-R, of 7 June.
2. Under no circumstances can the Customer Ombudsman assess complaints and make recommendations in a situation of conflict of interest, except with the express consent of the interested parties and as long as the conflict is not expressly forbidden by law.

## **Article 5 (Contact with the Insurance Company)**

The contacts between the Customer Ombudsman and the Insurance Company are handled through the Complaints Committee of the Insurance Company, the Head of Compliance (Ms. Ruth Quinn) or other person appointed by the Insurance Company.

Contact information: [00353-1-5685412](tel:00353-1-5685412)/[Info.IRL@octiumgroup.com](mailto:Info.IRL@octiumgroup.com)

## **Chapter II Procedure**

### **Article 6 (Complaints)**

1. Complaints from policyholders, insured persons and beneficiaries may be submitted to the Customer Ombudsman in the following situations:
  - a) No response has been given within 20 (twenty) business days after their reception by the competent services of the Insurance Company or within 30 (thirty) business days for cases deemed particularly complex; or
  - b) If the claimant disagrees with the response given within the deadline referred in a) above.
2. The Insurance Company department responsible for receiving and sending the respective answer to the complaints is the Octium Complaints Committee. Contact information: 00353-1-5685412/ [Info.IRL@octiumgroup.com](mailto:Info.IRL@octiumgroup.com).

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3. The complaint addressed to the Customer Ombudsman is made in writing, in Portuguese or in English, and contains the following information:

- a) Complete identification of the claimant, address, tax identification number, telephone number and email address;
- b) Identification of the policy and other contractual elements as appropriate;
- c) Indication of the date of submission of the claim to the complaint department of the Insurance Company;
- d) Description of the conduct of the Insurance Company within the scope of the complaint submitted and decision made by the complaint department of the Insurance Company (if any);
- e) Detailed description of the facts that motivated the claim; and
- f) Identification of the reason for disagreement with the decision issued by the complaint department of the Insurance Company (if any).

4. The claimant shall provide all the documents that he/she deems necessary for a correct assessment of the dispute and shall also indicate the witness(s) whose hearing he/she deems necessary.

5. The complaint shall be addressed directly to the Customer Ombudsman by e-mail or to the address mentioned in article 1 of the present Regulation.

## **Article 7**

### **(Amendment to the complaint and preliminary rejection)**

1. Once the complaint has been received, the Customer Ombudsman may invite the claimant to complete the missing information, namely the minimum elements detailed in paragraph 4 of the previous Article.

2. The Customer Ombudsman may reject the complaint if:

- a) The claimant was requested to complete the missing information and has not acted accordingly within the period of time established for that purpose;
- b) The object of the complaint is not within the competence of the Customer Ombudsman;
- c) The complaint is repeated in relation to other complaint(s) submitted by the same claimant and on the same subject, in relation to which the Customer Ombudsman has already issued an opinion;
- d) The complaint has not been submitted to the prior analysis of the competent services of the Insurance Company or has been submitted to the analysis of the Customer Ombudsman before the expiry of the deadline provided for in paragraph a) of no. 1 of Article 6 of the present Regulation;
- e) The complaint is manifestly contrary to the principles of good faith, vexatious or inconsequent;
- f) The complaint is pending resolution by judicial or arbitral means.

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## **Article 8**

### **(Decision making process)**

1. The Customer Ombudsman decides freely on the instruction of the proceeding, taking into account the facts presented in the complaint and the complexity of the case.
2. The Insurance Company shall provide all information and documentation that is required for the decision-making process of the Customer Ombudsman and assure that all conditions are in place for the proper fulfillment of the Ombudsman's duties.
3. The steps eventually suggested by the claimant or by the Insurance Company do not bind the Customer Ombudsman.
4. The Customer Ombudsman may request from the Insurance Company or the claimant the clarifications that are deemed necessary and hear whoever is deemed appropriate.
5. All expenses involved in the analysis of the complaint and preparation of the relevant recommendation are supported by the Insurance Company.

## **Article 9**

### **(Decision)**

1. The Customer Ombudsman shall decide a complaint within 30 (thirty) business days from the date of the reception or, if an amendment to the complaint has been requested, from the end of the deadline set for that purpose.
2. The deadline provided for in 1. above is extended to 45 (forty-five) business days in cases of special complexity.
3. The assessment of the complaint and eventual recommendations shall be communicated in writing, signed by the Customer Ombudsman and duly substantiated and communicated to the claimant and to the Insurance Company.
4. If the Customer Ombudsman has addressed recommendations to the Insurance Company, the latter shall inform the Customer Ombudsman, within 20 (twenty) days from reception of the decision, whether the recommendations in question have been accepted.
5. In case of non-acceptance, the Customer Ombudsman shall inform the claimant of such fact.

## **Article 10**

### **(Intervention and omissions)**

Anything not provided for in this Regulation or that is not properly regulated is decided by common agreement between the Insurance Company and the Customer Ombudsman.

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## **Article 11 (Legal regime)**

This Regulation is subject to the provisions of the Legal Framework for Access and Exercise of Insurance and Reinsurance Activities (Law No. 147/2015, of 09 September) in respect of the nature and activity of the Customer Ombudsman, as well as to the provisions of complementary regulatory standards issued by the ASF, in particular Regulatory Standard No. 7/2022-R, of 7 June.

## **Article 12 (Amendments to the Regulation)**

At the end of each annual mandate of the Customer Ombudsman, the present Regulation may be reviewed in order to accommodate any legal or regulatory changes.