

Complaints Management Regulation UrHome Group

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INTRODUCTION

The UrHome Group currently consists of the companies Vista Bay, SA, taxpayer ID 518 472 990, with registered office at Rua Duque de Palmela, 27 1 dt, 1250-097 Lisbon, and Future Profit, Mediação Imobiliária, Lda, taxpayer ID 513 388 818, also with registered office at Rua Duque de Palmela, 27 1 dt, 1250-097. Within its activities, the UrHome Group attaches great importance to service quality, which is a key element in its positioning and differentiation in the market. The satisfaction of Clients, Potential Clients, and Partners is therefore central to all actions of the UrHome Group and its employees. This objective is also pursued through an effective and efficient complaints-handling system.

The **Complaints Management Regulation** (hereinafter the “**Regulation**”) are thus a key instrument for the UrHome Group, whose purpose is to identify ~~find~~ appropriate solutions for each complaint submitted, using simple, transparent and precise language. ~~Furthermore,~~ the analysis and handling of complaints also enables the UrHome Group to introduce improvements and adjustments to its business activity.

The UrHome Group ensures all legally required channels and means for customers and other interested parties to file a complaint.

SCOPE OF APPLICATION

1. The purpose of this Regulation is to establish the procedures followed by the UrHome Group in managing and responding to formal complaints submitted to the companies within the UrHome Group.
2. For the purposes of this Regulation, a “Complaint” is considered to be any communication from a Client, ~~or~~ Potential Client or other interested party (“**Complainant**”), submitted directly to the UrHome Group or through consumer protection or supervisory entities, by which the Complainant expresses disagreement, objection, opposition or reports adverse events arising from their relationship with the UrHome Group, namely due to non-compliance with legal or contractual provisions.
3. Complaints may be submitted in respect of all products and services marketed by the UrHome Group or regarding the actions of UrHome Group employees in the course of their duties.

WHO CAN FILE A COMPLAINT?

1. Any individual or legal person may file a complaint with the UrHome Group regarding a situation in which they are directly involved.
2. A complaint may also be filed by a legal representative or a duly authorized person ~~volunteer, upon~~ subject to proof of their powers of representation.

TO WHOM SHOULD A COMPLAINT BE SUBMITTED

1. Complaints must be submitted through the following channels:
 - a. By registered letter to Rua Duque de Palmela, 27 1 dt, 1250-097 Lisbon;
 - b. By email to geral@urhome.pt;
 - c. Through the Complaints Book, available at the company's registered office other designated locations or at www.livroreclamacoes.pt;
 - d. Through the Group's digital channels, at www.urhome.pt;
 - e. Through the supervisory authorities with which the Urhome Group has its companies are registered.
2. Without prejudice to the above, the UrHome Group also offers various of customer support, to maintain continuous dialogue and excellent a high level of service, including clarification of doubts, implementation of instructions, and resolution of incidents. In this context, Customers may contact the UrHome Group through the following means:

- i. By telephone (+351 211 342 101, from Portugal and abroad – call charged at the national landline rate), available 24 hours a day;
- ii. Through the Group's digital channels at www.urhome.pt;
- iii. By email, to the address geral@urhome.pt;

HOW SHOULD A COMPLAINT BE SUBMITTED FILED

1. Complaints must be submitted in writing, on paper or in another medium.
2. Complaints must be submitted within a maximum period of two years from the date of the event, or the date on which the Complainant became aware of the event, that gives rise to the complaint.
3. The Complaint must contain the following elements:
 - a) Identification of the Complainant, including:
 - i. Full name, tax number and civil identification number;
 - ii. Contact details address, email and/or mobile phone number.
 - b) Description of the facts that motivated the Complaint, including the identification of those involved and the date on which the facts occurred, unless this is manifestly impossible;
 - i. Date and place of submission of the complaint.
 - c) Document proving the powers of representation, when the complaint is submitted by a representative; and
 - d) Supporting documents necessary for the assessment of the complaint.

WHAT PRINCIPLES APPLY IN THE EVENT OF A COMPLAINT

1. The submission, management and response to complaints by the UrHome Group, are free of charge.
2. The management of the UrHome Group is responsible for conducting the entire complaint process, in alignment with the Group's General Code of Conduct, both available at www.urhome.pt.
3. Submitting a complaint to the Group or its companies does not preclude the possibility of submitting a complaint to supervisory authorities.
 - a) The UrHome Group will liaise with supervisory authorities on these matters and will maintain a record of all complaints received, as well as the respective responses sent to complainants and supervisory authorities.
4. The UrHome Group acts in accordance with the Code of Conduct in its relationship with customers, ensuring that situations that may give rise to conflicts of interest are adequately prevented, identified and managed. Throughout the process, a separation is ensured between the area responsible for assessing and deciding on the complaint and the area from which the complaint originated.

WHICH CASES CAN A COMPLAINT BE REJECTED

1. The UrHome Group may reject a complaint in the following cases:
 - i. Lack of identification of the complainant or their representative, as applicable.
 - ii. The complaint concerns a matter within the exclusive jurisdiction of arbitration or judicial bodies, or where the subject of the complaint has already been decided by such bodies.
 - iii. The complaint is manifestly unfounded or not directly related to products and services marketed by the UrHome Group.
 - iv. The complainant has previously filed a complaint regarding the same facts.
2. If the necessary requirements, are not met, particularly where the grounds for the complaint are not substantiated, the complainant will be contacted by the UrHome Group to rectify or amend the complaint in order to remedy this omission.
3. If, after such communication, the complaint is not duly rectified, it will be filed, and the complainant will be notified.
4. If the complaint submitted does not concern the activity of the UrHome Group, the Administration will inform the complainant of this fact, directing, if possible, the complaint to the appropriate sector entity.
5. The UrHome Group uses an IT system for recording, processing and archiving of all complaints submitted, ensuring full compliance with security requirements relating to the data and documentation submitted by the complainant.

WHAT IS THE COMPLAINT DECISION PROCESS

1. In the case of a complaint submitted through the physical Complaints Book, once registered, the page marked "Duplicate" will be detached from the (physical) Book and given to the complainant.
2. The Administration must acknowledge receipt of all complaints received, and must do so on the same day or the next business day after receipt, by written communication, via SMS, or email.
3. Once the complaint has been admitted, the Administration carries out all the necessary investigations to ascertain the facts alleged by the complainant, impartially and diligently analyzing the documentation provided.
 - a) The UrHome Group may request additional information or clarifications from the complainant as deemed relevant.
4. After the investigations described above are completed, the Administration decides on the complainant's claim, either upholding or rejecting it.
5. The decision regarding the Complaint is duly reasoned, and drafted in simple and clear language.
6. If the Complainant's claim is upheld, the UrHome Group will implement the changes deemed necessary to appropriately rectify the situation.
7. The UrHome Group's decision will be communicated in writing to the Complainant through the contact details registered in the Group's Customer database.
8. If the Complainant is not a Customer of the Group, the communication will be sent to the address, mobile phone number (via SMS), or email provide in the complaint.
9. Should the Claimant's claim be deemed unfounded, appropriate clarifications will also be provided in writing as indicated above, or alternatively, the relevant representative may contact the complainant directly to provide further explanation.
10. The complainant must be informed of the options available for further pursuing their complaint, in accordance with the applicable legal and regulatory provisions, should the response not fully satisfy the terms of the complaint submitted.
11. Whenever it is not possible to respond to the complaint within 7 working days, the Administration informs the complainant that their complaint is under review, and that a response will be provided as soon as possible.
12. The UrHome Group will respond to complaints within the following timeframes, depending on the channel through which they were submitted or the subject matter:
 - i. Complaints Book: 15 working days;
 - ii. APMI: 15 working days;
 - iii. Bank of Portugal: 20 working days;
 - iv. Securities and Exchange Commission: 15 working days;
 - v. Insurance Authority: 15 working days;
 - vi. Distribution of insurance products: 15 working days;
 - vii. Other complaints (not involving supervisory bodies): 30 working days.
13. The timeframes are counted from the working day following the receipt of the complaint.
14. If it is not possible to respond within the specified timeframe, due to the particular complexity of the situation in question, the Administration will, whenever possible, keep the complainant informed of the steps taken.

ALTERNATIVE DISPUTE RESOLUTION METHODS – PRODUCTS AND SERVICES

Consumer Clients

The UrHome Group is a member of the following Arbitration Centers of the Consumer Arbitration Network:

- **Lisbon Consumer Conflict Arbitration Center (CACCL).**

The UrHome Group ensures, under the applicable law, that its consumer clients have access to these arbitration centers in the following situations are at issue:

- i. Disputes arising from the marketing and provision of consulting services.

Consumer clients may also resort to any Arbitration Centers of the Consumer Arbitration Network for other **consumer disputes** not covered in the preceding paragraphs, under the terms of Article 14 of the Consumer Protection Law.

If the consumer dispute is **cross-border**, the consumer may contact the Lisbon Consumer Conflict Arbitration Center (www.centroarbitragemlisboa.pt), which is a part of the network of national bodies competent to resolve cross-border disputes related to the provision of services out of court. The resolution of consumer disputes related to the aforementioned services through other entities affiliated with the FIN-NET network subject to the agreement of UrHome.

LEARN MORE

Additional information about all the Arbitration Centers mentioned above is available on their respective websites and on the [website of the Directorate-General for Consumer Affairs](#).

FILE

The Administrative Area ensures the centralized archiving of all complaints received within the legally established deadlines.