



| Customer Service Policy

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Index

Important information about this document.....	4
1. Objective scope of application.....	5
2. Qualitas Energy	5
3. Qualitas Energy Compliance System	5
4. Objective and scope.....	5
Article 1. Introduction	5
Article 2. Objectives of the Policy	6
Article 3. Dissemination of the Policy	6
5. Customer service	7
Article 4. Designation of the Head and the composition of the Service	7
Article 5. Autonomy and means	7
Article 6. Training.....	7
6. The head of the customer service	8
Article 7.- Conditions of the Service Head.....	8
Article 8. Term of office.....	8
Article 9. Causes of incompatibility	8
Article 10. Termination of Office of the Incumbent.....	8
7. Service competencies.....	9
Article 11. Competencies of the Service	9
Article 12. Exclusions from Service	10
8. Obligations of the Management Company.....	10
Article 13. Obligation to collaborate	10
Article 14. Information Obligations.....	11
9. Complaints and claims procedure	11
Article 15. Purpose.....	11
Article 16. Form.....	12
Article 17. Deadline.....	12
10. Processing.....	13
Article 18. Admission to proceedings.....	13
Article 19. Processing	14
Article 20. Amicable Settlement, Settlement and Withdrawal.....	14

Article 21. Deadline for the resolution of files.....	14
Article 22. Content and notification of the resolution.....	15
Article 23. Conflicts of interest.....	15
11. Effects of the resolution	16
Article 24. Effects of the resolution for the claimant and for the Management Company.....	16
12. Other aspects.....	16
Article 25. Internal registry	16
Article 26. Relationship with other instances.....	17
Article 27. Annual Report	17
Article 28. Approval and modification of the Policy.....	17
Article 29. Data protection	18
Annex I.....	19
Contact details	19
Annex II.....	20
Notification of receipt of complaints and/or claims.....	20

Important information about this document

Document Identification	Customer Service Policy
Application of this Document	Global
Document hereby repealed	Customer Service Complaints and Claims Policy Customer Defense Regulation
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Responsible for the application of this Document	Compliance Department
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1. Objective scope of application

Q-ENERGY PRIVATE EQUITY S.G.E.I.C., S.A. (hereinafter, the "**Management Company**" or "**Qualitas Energy**"), is a management company of closed-end collective investment entities, with national and international geographic scope. The main activity of the Management Company is the management of the investments of one or more private equity entities and closed-end collective investment entities, as well as the management and control of their activity and risks.

2. Qualitas Energy

The Management Company is fully integrated within the structure chaired by the Qualitas Energy brand, which is in turn composed of the vehicles it manages after registration with the National Securities Market Commission (CNMV) (hereinafter, the "**Vehicles**"), by the companies in which the latter have an interest (the "**SPVs**"), by the subsidiaries of the Management Company incorporated abroad (the "**Subsidiaries**"), and by a number of other entities that provide, among others, management and advisory services in the financial market, especially in the renewable energy sector.

3. Qualitas Energy Compliance System

The Management Company has an independent and autonomous Compliance System, which essentially reflects the ethical culture that formally originates from the Board of Directors and is made up of a compendium of internal rules that have been approved to reflect Qualitas Energy's commitment to said culture and principles; and which also serve to comply with all applicable national and international external regulations.

The basic pillars of the Management Company's Compliance System are Qualitas Energy's Code of Ethics and Conduct, which in turn has an adhesion procedure through which other entities belonging to the Qualitas Energy brand are integrated to such Compliance System, of which this Policy is part.

4. Objective and scope

Article 1. Introduction

Law 44/2002, of November 22, 2002, on Financial System Reform Measures, implemented by Order ECO/734/2004, of March 11, 2004, on Customer Service Departments and Services and the Customer Ombudsman of Financial Institutions (hereinafter, the "**Order**") establishes a series of protective measures for customers of financial services.

Among these measures, the Order establishes the obligation to designate a Customer Service Department and to approve a customer defense policy, which regulates the requirements and procedures that the Customer Service must comply with.

In addition to the aforementioned regulations, Order ECC/2502/2012, of November 16, regulating the procedure for submitting complaints to the complaints services of the Bank of Spain, the National Securities Market Commission and the Directorate General of Insurance and Pension Funds, Circular 7/2013, of September 25, of the National Securities Market Commission, regulating the procedure for resolving claims and complaints against companies that provide investment services and answering queries in the securities market and the Guidelines on complaints and claims management for the securities and banking sectors published by ESMA on May 27, 2014, as well as other applicable regulations have been considered.

In this context and in accordance with the aforementioned regulations, the Board of Directors of Qualitas Energy has approved this Customer Service Policy (hereinafter referred to as the "**Policy**").

Article 2. Objectives of the Policy

The main purpose of the Policy is to regulate the internal procedures established by the Management Company for the protection of the rights of customers and users of financial services and, specifically, to regulate the Customer Service Department (hereinafter, "**Service**") as the body in charge of attending to and resolving the complaints and claims submitted by the Management Company's customers, directly or through representation, all in accordance with the provisions of the Order.

The Policy shall be applicable to natural or legal persons, whether Spanish or foreign, who are clients or users of the financial services provided by the Management Company, provided that such complaints and claims refer to their legally recognized interests and rights, whether arising from contracts, transparency and customer protection regulations or good banking practices and financial uses, in particular, the principle of equity. Such persons shall be referred to hereinafter generically as "client" or "clients".

For the purposes of this Policy, a complaint shall be understood to mean delays, inattention or any other type of deficient performance observed by a client in the operation of the Management Company.

On the other hand, claims shall be understood to be actions or omissions by the Management Company that are detrimental to the interests or rights of the customers making them and that derive from alleged breaches by the Management Company, the regulations on transparency and customer protection or good financial practices and uses, in particular, the principle of fairness.

Article 3. Dissemination of the Policy

A copy of this Policy shall be available to customers and the general public at the Management Company's offices, as well as on its website.

5. Customer service

Article 4. Designation of the holder and the composition of the Service

The holder of the Service (hereinafter, "**Holder**") shall be appointed by the Board of Directors of Qualitas Energy.

The designation will be communicated to the *Comisión Nacional del Mercado de Valores* (hereinafter, "**CNMV**") and, if applicable, to the rest of Qualitas Energy's supervisors.

Likewise, the Board of Directors shall be competent to approve the composition of the Service, which must have sufficient personnel for the correct development of the competencies attributed to the Service by the applicable legislation and this Policy.

Article 5. Autonomy and means

The Management Company shall adopt the necessary measures to separate the Service from the other commercial or operational departments, so as to ensure that the Service makes autonomous decisions regarding the scope of its activity and avoids conflicts of interest.

Likewise, it shall ensure that the Service is provided with the human, material, technical and organizational means adequate for the fulfillment of its functions.

Qualitas Energy will establish appropriate procedures and means in order to enable the Service:

- Send an acknowledgement of receipt within a maximum of three working days of complaints or grievances being submitted .
- Collect from the different departments of the Management Company all the information necessary to process and resolve complaints and claims.
- Issue the resolution of the complaint and claim within the period established for this purpose.

The Management Company shall adopt the appropriate measures to ensure that the procedures foreseen for the transmission of the information required by the Service to the other areas of the Management Company comply with the principles of speed, security, efficiency, and coordination.

Article 6. Training

The Management Company shall take the necessary actions to ensure that the personnel of the Service have adequate knowledge of the Management Company's own financial activity and, in particular, the regulations on transparency and protection of customers of financial services.

In this regard, Qualitas Energy will ensure that the Service personnel receive the necessary training on the subject.

6. The Holder of the Customer Service

Article 7.- Conditions of the Holder

The Holder of the Service shall be a person of good business and professional repute, with adequate capacity, knowledge and experience to perform the duties inherent to the position.

For these purposes, commercial and professional honorability is conferred on those who have been observing a personal trajectory of respect for commercial laws or others that regulate economic activity and business life, as well as good commercial and financial practices.

Those who have performed functions related to the Management Company's own financial activity are presumed to have adequate knowledge and experience.

Article 8. Term of office

The appointment of the Holder of the Service shall be for an indefinite period.

Article 9. Causes of incompatibility

Persons who have a criminal record, are being prosecuted or have been indicted or have been tried for any crime shall not be eligible for election to the position of Holder of the Service.

Likewise, the performance in any unit of functions related to the commercial activity and any other function that could generate conflicts of interest shall be a cause of incompatibility.

Those persons who are in any of the following situations shall not be eligible to hold the position of Holder of the Service:

- Those declared bankrupt or insolvent bankrupts who have not been rehabilitated.
- Those who are disqualified or suspended, criminally or administratively, from holding public office or administrative or managerial positions in entities.
- Those who have a criminal record for intentional crimes.
- Those who have under their responsibility operational or commercial functions of the Management Company.
- Those who are employees, directors, administrators or provide professional services to companies competing with the Management Company.
- Those who hold political office or perform any other activities that could have public transcendence or that could in any way affect the public image of the Service.

Article 10. Termination of Office of the Incumbent

The Holder of the Service shall be removed from office for any of the following causes:

- Cause termination of the employment or professional services relationship with the Management Company for any reason.
- Having been convicted of a crime in a final judgment.
- When their continuance in office may adversely affect the functioning of the Service and its independence, the reputation or interests of the Management Company or in the event of notorious negligence in the performance of their duties, or because they are involved in any incompatibility situation provided for in this Policy.
- Waiver.
- At any time, by reasoned decision of the Board of Directors of the Management Company, provided that such decision is issued exclusively for serious and justified causes.
- For loss of the requirements and conditions necessary to be elected as a Holder of the Service.
- Due to death, physical impossibility of performance or other type of supervening incapacity.
- Serious non-compliance with its obligations, for cause or justified reason.
- For incurring in any of the causes of ineligibility or incompatibility provided in Article 9.

The Board of Directors shall be the competent body to dismiss the Holder of the Service and shall record in the resolution the reason for the dismissal and the causes justifying it.

Once the position becomes vacant, the Board of Directors of the Management Company shall proceed to appoint a new Holder of the same within thirty days following the vacancy. The appointment of the new Holder shall be immediately notified to the CNMV and, if applicable, to the other supervisors of the Management Company.

The termination and subsequent appointment of a new Holder of the Service shall not suspend the time limit for resolving a complaint or grievance.

7. Service competencies

Article 11. Competencies of the Service

The Service is responsible for the guardianship and protection of the rights and interests of customers legally or contractually recognized, as well as to ensure that relations between Qualitas Energy and its customers are developed at all times in accordance with the principles of good faith, fairness and mutual trust.

The Service will also be responsible for promoting strict compliance with regulations on customer protection and transparency.

Specifically, and in compliance with its competencies, the Service is responsible for:

- To resolve complaints and claims that clients may raise in relation to investment operations, contracts, or services and, in general, with all relations between the Management Company and its clients, in which, in the opinion of the latter, their legally or contractually recognized rights have been violated.
- Resolve issues raised by the various departments of the Management Company, with respect to their relations with customers.
- To collaborate with the different departments of the Management Company in order to promote compliance with regulation on customer protection and transparency. In particular, to collaborate with the Internal Control and Compliance Units.
- To collaborate, within the scope of its attributions, in the development of internal regulation.
- Respond to requests for information from the Complaints Services of the supervisors responsible for the subject matter.
- To collaborate, within the scope of its attributions, in the preparation of the Annual Report provided for in Article 27 of this Policy, as well as in the annual review of the Management Company's own Policy.

Article 12. Exclusions from Service

In any case, the following types of complaints or claims shall be excluded:

- Those relating to Qualitas Energy's labor relations with its employees.
- Those formulated by the clients or users of the services after a period of two years from the date on which the client had knowledge of the facts causing the complaint or claim and in accordance with Article 17.
- Those aimed at preventing the exercise of any right of the Management Company against the customer, provided that there is a manifest intention of the customer in this sense.
- Any other functions that do not fall within the functions outlined in Article 11 of the Policy.
- In any case, communications made by customers or users, aimed simply at requesting documentation or information from the Management Company, shall not be considered as complaints or claims, and shall not be considered as such.

8. Obligations of the Management Company

Article 13. Obligation to collaborate

Qualities Energy attaches great importance to strict compliance with applicable regulations, as well as with good financial and securities market practices in its relations with its customers. Therefore, the Management Company shall adopt the necessary measures to ensure that the Service performs the functions attributed by the applicable regulation and by these rules and regulations.

In this sense, all Qualities Energy departments shall collaborate with the Service in all matters that favor the best performance of its functions and, especially, shall provide all the information requested by the Service in matters within its competence and in relation to the issues submitted for its consideration.

To this end, all employees, officers and directors of the Management Company are obliged to cooperate with the Service, providing the data, reports, opinions and evidence requested by the Service.

Likewise, Qualities Energy, through the Board of Directors, will receive any complaints that may be made regarding the performance of the Service and will adopt, as the case may be, the decisions it deems appropriate.

Article 14. Information Obligations

The Management Company hereby makes the following information available to its customers:

- The existence of the Customer Service Department, with an indication of its postal and/or e-mail address.
- The obligation on the part of the Management Company to attend to and resolve the complaints and claims presented by its customers, within one month from their presentation at any office of the Management Company to the Customer Service Department, by post or through the e-mail address provided for this purpose. The resolution of the file, considering these deadlines, will be notified within a maximum of 10 working days from the date of the final resolution.
- Reference to the CNMV's Complaints Services, specifying their postal and e-mail addresses, and the need to exhaust the Management Company's Customer Service channel in order to file complaints and claims with said Complaints Services.
- References to the regulation on transparency and customer protection in financial services.

In the decisions concluding the procedures for processing complaints and claims, express mention shall be made of the complainant's right, in the event of disagreement with the outcome of the decision, to refer the matter to the CNMV's Complaints Service.

9. Complaints and claims procedure

Article 15. Purpose

Customers may contact the Service when they consider that Qualities Energy has violated the regulation on transparency and customer protection or when they consider that the Management Company has failed to comply, in whole or in part, with its legal or contractual obligations.

Article 16. Form

The presentation of complaints and claims may be made, in person or by proxy, on paper, in any office open to the public, by computer, electronic or telematic means, addressed to the e-mail address provided below, provided that these allow the reading, printing and conservation of the documents, and comply with the requirements set forth in the subscription contracts. The use of electronic or telematic computer means must comply with the requirements set forth in Law 6/2020, of November 11, regulating certain aspects of electronic trust services.

For these purposes, the Management Company's contact details are included in the [Annex I](#).

The procedure shall be initiated by filing a document stating:

- Name, surname, and address of the interested party and, if applicable, of the person representing him/her, duly accredited; identification document (ID card or equivalent in the case of foreigners) for natural persons and data referring to the public registry for legal entities.
- Relationship between the interested party and the Management Company, for example, specifying the investment vehicle in which the interested party is an investor.
- Date on which the interested party became aware of the facts that are the subject of the complaint or claim.
- Reason for the complaint or claim, with a clear specification of the issues on which a ruling is requested and, if applicable, the documentary evidence considered appropriate.
- Department or service where the facts that are the object of the complaint or claim have taken place.
- Statement by the client that he/she is not aware that the subject matter of the complaint or claim is being processed through an administrative, arbitration or judicial proceeding.
- Place, date and signature.

The claimant shall provide, together with the above document, the documentary evidence in his/her possession on which his/her complaint or claim is based.

Complaints and claims may be submitted in Spanish and/or English.

The submission and processing of complaints to the Service is completely free of charge.

Article 17. Deadline

The filing of a complaint or claim by a client with the Service must be made within two years from the date on which the client became aware of the facts giving rise to the complaint or claim.

Complaints or claims submitted after the deadline will be rejected.

10. Processing

Article 18. Admission to proceedings

Once the complaint or claim has been received by the Management Company, it will be forwarded to the Service, which will proceed to open a file.

Qualitas Energy shall acknowledge receipt in writing in accordance with the [Annex II](#) and leave a record of the date of presentation, in any of the Management Company's instances, for the purpose of calculating the period for resolving.

The complaint or claim shall be submitted only once by the interested party and may not be required to be reiterated before different bodies of the Management Company.

If the identity of the claimant is not sufficiently accredited, or if the facts that are the object of the complaint or claim cannot be clearly established, the claimant will be requested to complete the documentation submitted within a period of ten calendar days, with the warning that, if this is not done, the complaint or claim will be filed without further processing. The period used to correct the errors will not be included in the calculation of the period foreseen for the resolution of the claim.

If, at a later time, the complainant should prove his or her identity or provide new documentation on the facts that are the subject of the complaint or claim, a new file will be opened on the same facts.

Complaints and claims may only be rejected for processing in the following cases:

- When essential data for the processing that cannot be corrected are omitted, including those cases in which the reason for the complaint or claim is not specified.
- When they are intended to be processed as a complaint or claim, resources or different actions, whose knowledge is the competence of administrative, arbitration or judicial bodies, or the same is pending resolution or litigation, or the matter has already been resolved in those instances.
- When the issues subject to complaint or claim do not refer to interests and rights legally recognized to individuals as Qualitas Energy customers, or when the facts, reasons and request in which the issues subject to the complaint or claim are specified do not refer to specific operations.
- When complaints or claims are presented that are a reiteration of previous complaints or claims already resolved, presented by the same client in relation to the same facts.
- When the two-year period for filing complaints or claims has elapsed.
- When the Service becomes aware of the simultaneous processing of a complaint or claim and an administrative, arbitration or judicial proceeding on the same matter, it shall refrain from processing such complaint or claim.

When the complaint or claim is deemed inadmissible for any of the aforementioned reasons, it shall be notified to the interested party by means of a reasoned decision, giving him/her a period of ten calendar days to present his/her arguments. Once the

interested party has replied, in the event that the reasons for non-admission are maintained, he/she shall be informed of the final decision adopted.

Article 19. Processing

During the processing of the file, the Service may request, both from the complainant and from the department or departments involved, any data, clarifications, reports or evidence it deems necessary for the resolution of the case. The Service may set reasonable deadlines for the completion of these requests in each case.

Article 20. Amicable Settlement, Settlement and Withdrawal

Prior to the resolution, the Customer Service Department may do everything necessary to try to reach an amicable agreement between the parties, which, if reached, will be binding for both parties.

If, in view of the complaint or claim, the Management Company rectifies its situation with the complainant to the latter's satisfaction, it shall notify the competent body and provide documentary justification, unless the interested party expressly withdraws. In such cases, the complaint or claim shall be filed without further action.

Interested parties may withdraw their complaints and claims at any time. Withdrawal will result in the immediate termination of the procedure as far as the relationship with the interested party is concerned.

However, the Service may agree to the continuation of the same within the framework of its function of promoting compliance with transparency and customer protection regulation and good financial practices and usages.

Article 21. Deadline for the resolution of files

The file must be completed within a maximum period of one month (or two months in the case of customers who are not considered consumers), from the date on which the complaint or claim was submitted to the Customer Service Department, in any office open to the public, if any, by post or at the e-mail address provided for this purpose.

- a) In the event that the client has the status of consumer in accordance with Law 7/2017, of 2 November, after one month without having received a reply or in case of disagreement with the result of the Service's pronouncement, the claimant may then go to the Complaints Service of the CNMV (CNMV Complaints Service: Edison, 4, 28006 Madrid - Passeig de Gràcia, 19, 08007 Barcelona) or, where appropriate, of the competent supervisors by reason of the matter. In the following link you can access the form for filing a complaint with the CNMV <https://www.cnmv.es/DocPortallnv/OtrosPDF/ES-FormularioreclamacionequejasCNMV.pdf>

In the case of consumers, the period to file a complaint with the competent complaints services established by the applicable Policy shall be one year from the date on which the Management Company issued its resolution or, in the

absence of such resolution, from the date on which it should have issued its resolution.

- b) In the event that the client is not a consumer, after two months without having received a reply or in the event of disagreement with the outcome of the Service's decision, the claimant may then go to the CNMV Complaints Service (CNMV Complaints Service: Edison, 4, 28006 Madrid - Passeig de Gràcia, 19, 08007 Barcelona) or, where appropriate, the competent supervisors for the matter. The following link provides access to the form for filing a complaint with the CNMV <https://www.cnmv.es/DocPortalInv/OtrosPDF/ES-Formulario reclamacion quejas CNMV.pdf>

In this case, the time limit for filing a claim before the competent claims services established by the applicable regulation shall be six years from the date of the causal event.

If a complaint or claim has a formal defect that can be remedied by the customer, the above-mentioned deadlines will be interrupted for the customer to remedy the defect. Once the defect has been remedied, the deadlines will be resumed from the moment of suspension.

Article 22. Content and notification of the resolution

The resolutions of the Service that decide on the complaints or claims submitted to it shall always be reasoned, containing clear conclusions on the request made. Said resolutions shall be based on the legal rules applicable to the case, the contractual clauses, the rules of transparency and customer protection, as well as good financial practices and uses. In the event that the resolution deviates from the criteria expressed in previous similar cases, the reasons justifying the change of criterion shall be stated.

Decisions shall be rendered in the same language in which the complaint or grievance was filed.

The resolutions of the Service shall contain an express reference to the complainant's right, in the event of disagreement with the result of the decision, to resort to the CNMV's Complaints Services.

Once the resolution has been issued, it shall be notified to the claimant within a maximum period of ten calendar days from the date of the resolution, through the same means in which the complaint or claim was filed, unless the claimant expressly designates another method.

Article 23. Conflicts of interest

In those claims or complaints in which the Holder has a personal interest that produces or may produce a conflict of interest, the Holder shall abstain from participating in the processing and resolution of the complaint or claim, corresponding its instruction and resolution to the person who occupies the most relevant position in the Service after the Holder.

Likewise, when any of the members of the Service has a personal interest that produces or may produce a conflict of interest, he/she shall abstain from participating in the processing and proposal of the resolution.

For such purposes, it shall be understood that there is personal interest when the claim or complaint in question, or another similar or related to the above, directly affects him or her or his or her relatives up to the third degree of consanguinity or affinity, or those other persons with whom he or she maintains or has maintained a special bond of friendship or affectivity.

Likewise, it shall be understood that there is personal interest when the Holder of the Service, or any of the members of the Service, had been rendering their professional services in the department affected by the complaint or claim at the time when the complaint or claim arose, or its effects unfolded.

11. Effects of the resolution

Article 24. Effects of the resolution for the claimant and for the Management Company

The claimant is not obliged to accept the resolution issued by the Service and may exercise the administrative and legal actions it deems appropriate.

Thus, the resolution issued by the Service will be binding for the Management Company, but not for the claimant, who will not have to waive any subsequent right or instance in defense of its interests.

In the event that the resolution is favorable to the claimant, the resolution shall be executed within a maximum period of one month when it obliges the claimant to pay an amount or to perform any other act in favor of the client, unless, given the circumstances of the case, the resolution establishes a different term. The term for execution shall be counted from the day following the day on which the claimant is notified of the resolution of his claim, unless he expressly states that he does not agree with the resolution proposed by the Management Company.

12. Other aspects

Article 25. Internal registry

The Customer Service Department shall internally record all complaints and claims received, in accordance with the provisions of this Policy.

The internal resolution procedure, as well as the resolutions adopted internally and forwarded to the client, must also be controlled and recorded.

Article 26. Relationship with other instances

Qualitas Energy will attend, through the Holder of the Service, to the requirements that the Complaints Services of the National Securities Market Commission may make in the exercise of its functions, in accordance with the provisions of its regulatory regulations.

Article 27. Annual Report

Within the first quarter of each year, the Service shall submit to the Board of Directors an explanatory report on the performance of its functions during the preceding year.

The Annual Report shall have the following minimum content:

- Statistical summary of the complaints and claims handled, with information on their number, admission for processing and reasons for non-admission, reasons and issues raised in the complaints and claims, and amounts and amounts involved.
- Summary of the decisions issued, indicating whether they are favorable or unfavorable to the claimant.
- General criteria contained in the decisions.
- Recommendations or suggestions derived from its experience, with a view to better achieving the goals that inform its actions.
- The Annual Report may include recommendations or suggestions aimed at facilitating better relations between the Management Company and its clients. The Management Company may also agree to publish those resolutions it deems appropriate, given their general interest, while maintaining the confidentiality of the identity of the parties involved.

At least a summary of the Report will be integrated into Qualitas Energy's Annual Report.

Article 28. Approval and modification of the Policy

This Policy shall be approved by the Board of Directors of the Management Company, as well as any subsequent amendments that may be made.

Likewise, the Policy shall be reviewed at least once a year by the Compliance Department and shall be updated and/or modified, at least, in the following cases:

- a) When there are legal or regulatory changes that affect the provisions of this Policy.
- b) At the proposal of the Regulatory Compliance Department or the internal audit function, when it understands that there are aspects that could be improved in order to achieve the proposed objectives or to suitably adapt to the characteristics of the services offered by the SGEIC at any given time.
- c) At the proposal of the supervisory bodies.

The CNMV, in its capacity as supervisor of Qualitas Energy, is the competent body to verify both this Policy approved by the Board of Directors and any amendments thereto.

Article 29. Data protection

The personal data of individuals that are collected through the requests submitted to the Service will be treated in accordance with the Organic Law 3/2018, of December 5, 2018, on the Protection of Personal Data and guarantee of digital rights, and Regulation (EU) 2016/679, of April 27, 2016, general data protection; as well as the current regulations on Data Protection and that which develops it.

Annex I.

Contact details

The writings containing the complaints and claims, as well as those to be presented in the course of the procedures initiated on the occasion of the same, must be addressed to the Customer Service Department at the following addresses:

- SAC@qenergy.com
- Calle de Jenner, 3, 4º, 28010, Madrid

These contact details shall be included in the subscription contracts, in the KID, the Management Company's website, and in any other documentation that is sent to the Management Company's clients, so that they are aware of the procedure established for receiving complaints and claims.

Annex II.

Notification of receipt of complaints and/or claims

Dear Investor:

Thank you for the information provided.

We inform you that the Customer Service Team will attend to your request and will carefully analyze its content.

We also inform you that, within a maximum period of one month (if you are considered a consumer) or two months (if you are not considered a consumer) you will receive a reply from us, once we have analyzed your communication and the relevant documentation.

In any case, please do not hesitate to contact us for any questions you may have.

Best regards,

Qualitas Energy Customer Service.