

COMPLAINT MANAGEMENT POLICY

Horizon Group

1. Introduction

1.1. This document constitutes the complaints management policy (the "**Policy**") applicable to Horizon Group entities, specifically:

- i) **Horizon Equity Partners Management II S.à r.l. ("HEP")** means a limited liability company (*société à responsabilité limitée*) incorporated under the laws of the Grand Duchy of Luxembourg, with its registered office at 15, Boulevard F.W. Raiffeisen, L-2411 Luxembourg and registered with the Luxembourg Commercial Register (*Registre de Commerce et des Sociétés de Luxembourg*) under number B 248.626; and
- ii) **Horizon Equity Partners - SCR, S.A. ("Horizon SCR")**, a venture capital fund management company, incorporated under Portuguese law, with registered office at Rua Rodrigues Sampaio, n.º 76, 2nd floor, 1150-281 Lisbon, and with a share capital of € 75,000, registered at the Lisbon Companies Registry Office under the single registration and legal person number 514 396 954.

(hereinafter, the "**Horizon Managers**")

1.2. This Policy establishes the principles and rules applicable to the treatment and relationship with investors, as well as the management of complaints submitted by them.

1.3. The policy was prepared in accordance with the provisions and regulations of Directive 2010/43/EU, of 1 July 2010, which regulates organisational requirements, conflicts of interest, the exercise of the activity, risk management and the content of the agreement entered into between the depositary and the management company, as well as, with a special focus on Horizon SCR, as transposed into the legislation applicable to each of the Horizon Managers.

2. Scope

The Complaints Management Policy is applicable to all employees, service providers and subcontractors of Horizon Managers.

3. General Principles

The general principles governing the Complaints Management Policy are as follows:

- a) Provision of fair, non-discriminatory, diligent and transparent treatment to all investors;
- b) Diligent, rigorous, impartial and transparent performance in the management of complaints;
- c) Effectiveness, adequacy and speed in the management procedures and resolution of investor complaints;
- d) Establishment of a function responsible for the management of complaints processes that acts as a centralised point of reception and response, duly identified internally and externally;
- e) Provision of the necessary information and clarifications in a clear, correct, precise, adequate and satisfactory manner, taking into account the profile of the complainant and the nature and complexity of the situation;
- f) The process for managing retail investor complaints, including its submission, handling and response, free of charge;
- g) Confidentiality and secrecy of all data, information and documentation shared by investors, as well as the content of the complaint and the specific situation, avoiding unauthorized access by third parties;
- h) Compliance with current data protection legislation;
- i) Promotion of direct interaction and continuous contacts with investors, in order to ensure the competence of the service, both face-to-face and remote;
- j) Compliance with the Horizon Managers' Conflicts of Interest Policy, in order to identify, prevent or mitigate any conflicts of interest;
- k) The processing and analysis, on an ongoing basis, of data relating to the management of complaints, in order to detect and correct recurring or systemic problems and to guard against any legal or operational risks.

4. Interveners and Responsibilities

- 4.1. The function responsible for managing complaints is the *Compliance Function* of each of the Horizon Managers.
- 4.2. The function responsible for managing complaints is responsible for:
 - a) Manage the reception, carry out the analysis and ensure the response to complaints submitted to it;
 - b) Maintain a permanently updated and complete register of complaints;

- c) Identify common problems and systematically reported in complaints and propose corrective measures/improvement proposals in order to prevent the recurrence of the causes of complaints for the same reasons.
- 4.3. The Compliance Function must be informed of all complaints received, and, if they are related to the Compliance Function, the Supervisory Board must be informed.
- 4.4. The Board of Directors is responsible for defining, implementing, evaluating and reviewing the Complaints Management Policy.

5. Submission of Complaints

- 5.1. Investors in the funds under management of each of the Horizon Managers may submit claims free of charge, in writing, in Portuguese or English, under the terms set forth herein.
- 5.2. Claims must meet the following requirements:
 - a) Written form;
 - b) Full identification of the Complainant and, if applicable, of the person representing him/her (full name, number of the Complainant's civil and tax identification document (TIN) or, in the case of a legal person, legal person identification number (NIPC));
 - c) Reference to the quality of the claimant;
 - d) Contact details of the complainant and, if applicable, of the person representing him/her (mobile phone and email);
 - e) Clear and reasoned identification of the issue complained of;
 - f) Description of the facts that gave rise to the complaint, with identification of the parties involved and the date on which the facts occurred, if possible;
 - g) Additional elements that the complainant considers necessary for the management of his or her complaint;
 - h) Date and place of complaint.
- 5.3. Whenever the complaint submitted does not include the necessary elements for the purposes of its management, namely when the reason for the complaint is not

materialized, the relevant Horizon Manager will inform the complainant, inviting him to remedy the omission.

- 5.4. If the complaint submitted does not relate directly or indirectly to the activity of Horizon Managers, Horizon must inform the complainant of this fact, directing the complaint to the complained entity, if it maintains commercial relations with it.
- 5.5. Non-admission of claims by the relevant Horizon Manager may occur when:
 - a) Essential data that makes its management unfeasible and that has not been corrected are omitted;
 - b) If you intend to file a complaint regarding a matter that falls within the exclusive competence of arbitral or judicial bodies or when the subject matter of the complaint is pending or has already been decided by those bodies;
 - c) The complaint reiterates previous complaints that have been submitted by the same complainant in relation to the same matter and that have already been responded to by the relevant Horizon Manager;
 - d) The complaint has not been lodged in good faith or the content of the complaint is described as vexatious.
- 5.6. Whenever Horizon Managers do not admit complaints, invoking non-compliance with the pre-defined admissibility requirements, it will inform the complainant of this fact, justifying the non-admission.

6. Channels for submitting complaints

- 6.1. Complaints must be sent in writing by registered courier or with acknowledgement of receipt, or by e-mail to the following contacts:

For any of the Horizon Managers:

A/C: Compliance Function

Address: Rua Rodrigues Sampaio, nº 76, 2º, 1150-281 Lisboa

Email: info@horizonequitypartners.com

- 6.2. Investors will also be able to address their complaints directly to the competent authorities of each Member State.

For Horizon SCR:

Portuguese Securities Market Commission (CMVM), to the following contacts:

Dwelling: Rua Laura Alves, nº. 4 - Apartado 14258 1064-003 Lisboa

Email: cmvm@cmvm.pt

For HEP:

Commission for the Supervision of the Financial Sector (CSSF)

Morada: 283, route d'Arlon L-1150 Luxembourg

E-mail: direction@cssf.lu

7. Analysis and Management of Complaints

- 7.1. Upon receipt of the complaint in any of the channels described in point 6, it is registered in the relevant Horizon Manager's system.
- 7.2. On the date of registration, or within a maximum period of 3 (three) working days, the receipt of the complaint from the complainant must be acknowledged, preferably by e-mail.
- 7.3. The management of the complaint must begin within a maximum period of 5 (five) working days from the date of its internal registration.
- 7.4. Whenever necessary, clarifications/information are requested from the department regarding the complaint submitted and the complaint is forwarded with the respective reason for re-routing and deadline for response.
- 7.5. Based on the analysis of all the information and evidence collected, a response will be prepared and sent to the complainant, in a complete and reasoned manner and through clear and perceptible language, within a period not exceeding 20 (twenty) working days from the receipt of the complaint.
- 7.6. The response to the Complainant must include the following elements:
 - a) The identification of the person responsible for analyzing the complaint;
 - b) The final decision/pronouncement on whether the complaint is considered to be well founded;
 - c) The assessment made, duly reasoned, namely through the identification of the objective criteria of analysis and the demonstration that all relevant aspects have been fully and adequately analysed and investigated;
 - d) Where applicable, an indication of the measures implemented to resolve the situation;
 - e) If the complaint has not been accepted, provide justification;
 - f) If applicable, all documents, evidence and/or information that served to support the management and response to the complaint, as well as a copy of all communications sent.
- 7.7. In situations where the necessary steps to analyze the complaint prevent the internal deadlines defined for responding to the complaint from being observed,

the complainant will be informed as soon as possible and in a reasoned manner, indicating the estimated date for the conclusion of the analysis.

- 7.8. The complainant must be kept informed about the steps in progress and to be taken for the purpose of responding to the complaint submitted.
- 7.9. If the response does not fully satisfy the terms of the complaint submitted and the complainant wishes for a new re-examination, it may be suggested to schedule a meeting to discuss the situation.

8. Archiving, Conservation and Dissemination

- 8.1. The *Compliance Function* is responsible for maintaining an organized file of the complaints submitted, namely by maintaining its own file of each complaint process in paper or computer format for a minimum period of 7 (seven) years.
- 8.2. The Compliance Function is responsible for providing all the elements that the competent supervisory authorities may request.
- 8.3. The Complaints Management Policy is made available to the public on the Horizon Managers website as well as, whenever requested, through delivery or sending on paper or e-mail.

9. Duration

The Complaints Management Policy will be in force indefinitely, without prejudice to its updating and review, as well as the annual evaluation to be carried out under the terms set forth herein.

Lisbon, April 2, 2025