

EXTERNAL COMPLAINTS PROCEDURE

1. DEFINITIONS

- 1.1 *HLB Witlox Van den Boomen*: All legal entities, both jointly and individually, that at present or in the future will be part of the group to which HLB WVDB Holding B.V. belongs, namely HLB WVDB Holding B.V. and all affiliated companies.
- 1.2 *Board*: Board of Directors of HLB Witlox Van den Boomen.
- 1.3 *Business line*: A profession exercised within HLB Witlox van den Boomen by employees, organised from an entity set up for that purpose, such as, among others: Accountancy & Advice (A&A), Audit, Tax, HRM Services, Salary consultants, Corporate Finance, Pension consultants.
- 1.4 *Business line Board*: Statutory board of the entity in which the Business line is placed.
- 1.5 *Client*: Any natural person or legal entity that purchases or has purchased a service from HLB Witlox Van den Boomen.
- 1.6 *Compliance Officer*: The person who is charged organization-wide with the compliance tasks assigned to him/her, as included in the Compliance Charter.
- 1.7 *External Complaint*: Any written notification of conduct that may be in breach of legislation and regulations, rules of professional conduct or agreements between HLB Witlox Van den Boomen and the Complainant that complies with the provisions of Article 4.2.
- 1.8 *Complaints Officer*: The designated complaint handler charged with handling the complaint.
- 1.9 *Complainant*: Any natural or legal person who submits a complaint under these regulations.
- 1.10 *QRM*: (first-line) Quality Risk Management, the function charged on behalf of the organization with monitoring compliance with the quality policy and quality control system.

2. BACKGROUND AND SCOPE

HLB Witlox Van den Boomen has laid down its quality policy in writing and has organised its quality control system in accordance with the applicable legislation and regulations for the various Business Lines and its employees. Part of the quality control system is that client complaints are taken seriously and (as much as possible) dealt with satisfactorily.

- 2.2 The External Complaints Procedure of HLB Witlox Van den Boomen concerns any complaint filed by a complainant.
- 2.4 This procedure applies to every assignment agreement between HLB Witlox Van den Boomen and its clients, as well as to all work that HLB Witlox Van den Boomen carries out on behalf of its clients.
- 2.5 HLB Witlox Van den Boomen will ensure that complaints are dealt with in accordance with this external complaints procedure.
- 2.6 External complaints are internal registered (complaint, subject and specification) and maintained by the Compliance Officer, or designated Complaints Officer in the appropriate register.
- 2.7 This complaints procedure has been made public on the website of HLB Witlox Van den Boomen.
- 2.8 Prior to entering into the assignment agreement or via the general terms and conditions, the employees of HLB Witlox Van den Boomen will point out to their clients that HLB Witlox Van den Boomen operates an external complaints procedure and that this is applicable to the services to be provided and rendered.

3. GOAL

- 3.1 This complaints procedure serves several purposes:
 - Establishing a procedure to handle client complaints within a reasonable time and in a constructive manner;
 - Establishing a procedure to determine the causes of client complaints;
 - Maintain and improve existing relationships through proper complaint handling;
 - Train staff in client-centered response to complaints;
 - Improve service quality through complaint handling and complaint analysis.

4. PROCEDURE

- 4.1 Complaints must be submitted in writing for the attention of the HLB Witlox Van den Boomen complaints officer, stating the Businessline involved in the case in question. This can be done by e-mail (via compliance@hlb-wvdb.nl), or via the complaints form on the website of HLB Witlox Van den Boomen or by post.
- 4.2 A complaint should contain at least the following elements:
- The complainant's details name, (e-mail) address, telephone number;
 - The Date;
 - A description of which Business line or which employee is involved;
 - A description of the actions or omissions of the employee in question;
 - The complainant's relationship to HLB Witlox Van den Boomen;
 - Where applicable: an estimate of the expected damage.
- 4.3 HLB Witlox Van den Boomen may decide not to deal with a written complaint if, for example, the complaint does not satisfy the conditions mentioned in Article 4.2. In that case, the complainant will be given the opportunity to complete the complaint within two weeks after the notification has been sent, failing to do so HLB Witlox Van den Boomen will not be able to deal with the complaint.
- 4.4 HLB Witlox Van den Boomen seeks to confirm receipt of the complaint in writing within 8 working days of its receipt.
- 4.5 If a client approaches a member of staff or management of HLB Witlox Van den Boomen with a complaint, the complaint will be forwarded to the Compliance Officer. The Compliance Officer is the coordinating Complaints Officer. The complaint handling process may be carried out by another (complaints) officer or officers who is not involved in the conduct to which the complaint relates. From that moment on, the employee in question is no longer permitted to independently communicate with the Complainant about the content of the complaint without the prior consent of the Compliance Officer and/or the Complaints Officer.
- 4.6 The complaints officer will notify the person complained about and the Business line Board of the complaint submitted. The complainant and the person complained about will be given the opportunity to provide an explanation of the complaint. In addition, the complaints officer will consult with the insurance intermediary and, together with the insurance intermediary, decide whether or not the complaint meets the requirements for reporting to the insurer.

- 4.7 The Complaints Officer and the person complained about shall observe confidentiality in the handling of the complaint.
- 4.8 The person about whom the complaint has been made will try to reach a solution together with the client. The complaints officer is involved in this and has a coordinating role.
- 4.9 The Complaints Officer will notify the complainant and the person about whom the complaint has been made in writing of the opinion on the merits of the complaint, whether or not accompanied by recommendations. If and insofar as the complaint has been reported to the insurance company, the Complaints Officer may, where appropriate, delegate the above to an external lawyer. In all cases in which the complaint has been reported to the insurance company, the response will be coordinated with the insurer. Exceptions may be made with the consent of the insurer.
- 4.10 In the event that the complainant does not agree with the position stated in writing, or the proposed solution, the complainant may submit his/her complaint to the competent court or file a disciplinary complaint with the competent (professional) body.
- 4.11 If the complaint concerns services provided by the Business line Pension (or an employee thereof) and the complaint has not yet been properly resolved under these Complaints Regulations, the complainant may contact the Financial Services Complaints Institute (KiFiD). For more information, please refer to the website: <https://www.kifid.nl>.
- 4.12 The Complaints Officer will report periodically to the board of the Business line on the handling of complaints, make recommendations for the prevention of new complaints and (if necessary) make suggestions for improvements to the existing procedures. If the Complaints Officer is a different person from the Compliance Officer, the Complaints Officer will make the same report to the Compliance Officer.

5. RESPONSIBILITIES

- 5.1 The board of the Business line appoints the Compliance Officer as (coordinating) Complaints Officer for the complaint handling, the registration of all complaints received, the procedural and substantive review and the generation of management information. The Compliance Officer is permitted to appoint other

Complaints Officers in charge of the above. The Compliance Officer monitors progress.

- 5.2 During the processing of the complaint, the Complaints Officer in question will always keep the complainant and the person concerned informed of the progress of the processing, insofar as this is in accordance with the requirements of the insurance.
- 5.3 Any solutions will be coordinated in advance with the Business line Board and will also be coordinated in advance with the insurer.