

## Complaints procedure Van Bavel Advocaten B.V.

### **Article 1. Definitions**

In this complaints procedure the following definitions shall apply:

- complaint: any written expression of dissatisfaction by or on behalf of the client against the lawyer or persons working under his/her responsibility with respect to the development and execution of a Professional Services Agreement, the quality of the service provided, or the amount of the fee note, not being a complaint referred to in paragraph 4 of the Dutch Counsel Act;
- complaining person: the client or its representative making a complaint;
- complaints officer: the lawyer in charge of handling the complaint.

### **Article 2. Scope of application**

1. This complaints procedure is applicable to any professional services agreement between Van Bavel Advocaten and the client.
2. All lawyers of Van Bavel Advocaten shall be responsible for the handling of complaints in accordance with the complaints procedure.

### **Article 3. Purposes**

The purpose of this complaints procedure is:

- a. to lay down a procedure for the handling of client complaints within a reasonable time and in a constructive manner;
- b. to lay down a procedure for determining the causes of client complaints;
- c. to maintain and improve existing relationships through a proper handling of complaints;
- d. to train employees in client-focused response to complaints;
- e. to improve the quality of the services with the help of the handling and analysis of complaints.

### **Article 4. Information upon commencement of services**

1. The complaints procedure is made public. Before entering into a Professional Services Agreement, the lawyer shall point out to the client that the office has a complaints procedure, and that it is applicable to the services.
2. In its general terms and conditions, Van Bavel Advocaten has specified the independent party or authority to which a complaint may be submitted that has not been resolved after being actioned, in order to obtain a binding decision, and has made this clear in its confirmation of the client assignment.
3. All and any complaints referred to in Article 1 of this complaints procedure that have not been resolved after being actioned shall be submitted to the competent civil court in Amsterdam to obtain a binding decision.

### **Article 5. Internal complaints procedure**

1. If a client approaches the office with a complaint, the complaint shall be forwarded to Mrs P. America LLM, who shall act as the complaints officer. In the event of a

complaint against Mrs P. America LLM, Mrs. E. de Witte LLM shall act as the complaints officer.

2. The complaints officer shall inform the person against whom the complaint is addressed that a complaint has been filed, and shall give the complaining person as well as the person against whom the complaint is addressed the opportunity to comment on the complaint.
3. The person against whom the complaint is addressed shall make an effort together with the client to arrive at a solution with or without the intervention of the complaints officer.
4. The complaints officer shall handle the complaint within four weeks of receiving the complaint or she shall notify the complaining person of a different deadline with explanation, indicating the deadline by which an assessment shall be given about the complaint.
5. The complaints officer shall notify the complaining person as well as the person against whom the complaint is addressed in writing of the assessment regarding the merits of the complaint, with or without recommendations.
6. If the complaint has been handled satisfactorily, the complaining person, the complaints officer and the person against whom the complaint is addressed shall sign the assessment regarding the merits of the complaint.

#### **Article 6. Confidentiality commitment and free handling of complaints**

1. The complaints officer and the person against whom the complaint is addressed shall observe confidentiality in handling the complaint.
2. The complaining person shall not owe any compensation for the costs of handling the complaint.

#### **Article 7. Responsibilities**

1. The complaints officer is responsible for a punctual handling of the complaint.
2. The person against whom the complaint is addressed shall keep the complaints officer informed with respect to any contact between parties and a possible solution.
3. The complaints officer shall keep the complaining person informed about the handling of the complaint.
4. The complaints officer shall update the complaint file.

#### **Article 8. Complaint Registration**

1. The complaints officer shall register the complaint stating the complaint subject.
2. A complaint may be divided into multiple topics.
3. The complaints officer shall give regular progress reports if applicable regarding the handling of complaints, and shall make recommendations on how to prevent new complaints, as well as on how to improve complaint procedures.
4. At least once per year the reports and recommendations shall be discussed at the office and shall be submitted for a decision.