

## **Höcker Advocaten B.V. Complaints Procedure**

### **1. Definitions**

In this complaints procedure the following definitions apply:

- **complaint:** any written expression of dissatisfaction of or on behalf of the client towards the lawyer or the persons working under his/her responsibility regarding the conclusion and performance of a professional services agreement, the quality of the services or the amount of the fee note, not being a complaint within the meaning of paragraph 4 of the Dutch Act ("Lawyers Act");
- **complainant:** the client or his/her representative filing a complaint;
- **complaints officer:** the lawyer entrusted with the handling of the complaint;

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

2.1 This complaints procedure is applicable to all professional services agreements between the law-firm Höcker Advocaten B.V., a private company with limited liability under Dutch law, (hereinafter to be referred to as "Höcker") and the client.

2.2 All lawyers of Höcker shall ensure that any complaints will be handled in accordance with the complaints procedure.

### **3. Purpose**

The purpose of this complaints procedure is:

- a. to lay down a procedure for handling any client complaints within a reasonable period of time and in a constructive manner;
- b. to lay down a procedure for determining the causes of client complaints;
- c. continuation and improvement of existing relationships through proper handling of complaints;
- d. to train staff to respond to complaints in a service-minded manner;
- e. quality improvement of the services by handling and analysing complaints.

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

4.1 This complaints procedure has been published. Before entering into the professional services agreement, the lawyer shall point out to the client that the law firm applies a complaints procedure and that it is applicable to the services.

4.2 Höcker has set forth in article 5.2 of its General Terms and Conditions to what independent party or authority an unresolved complaint may be submitted in order to obtain a binding decision.

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

5.1 If a client approaches the law firm with a complaint, the complaint shall be forwarded to Mr P.P.J. Jongen, who shall act as complaints officer. In the absence of Mr Jongen the management board of the partnership will designate an alternate complaints officer.

5.2 The complaints officer shall notify the person who is the subject of the complaint of the fact that the complaint has been filed, and shall enable the complainant and the person who is the subject of the complaint to express their views on the complaint.

5.3 The person who is the subject of the complaint shall make an effort to reach a solution together with the client, after intervention of the complaints officer or otherwise.

5.4 The complaints officer shall handle the complaint within four weeks after receipt of the complaint or shall notify the complainant of deviation from this period, with motivation, stating the deadline for reaching a decision on the complaint.

5.5 The complaints officer shall inform the complainant and the person who is the subject of the complaint in writing regarding the validity of the complaint, accompanied by recommendations or otherwise.

5.6 If the complaint has been handled satisfactorily, the complainant, the complaints officer and the person who is the subject of the complaint shall sign the decision on the validity of the complaint.

### **6. Non-disclosure and free handling of the complaint**

6.1 The complaints officer and the person who is the subject of the complaint shall observe confidentiality regarding the handling of the complaint.

6.2 The complainant does not owe any fee for the handling of the complaint.

### **7. Responsibilities**

7.1 The complaints officer is responsible for a punctual handling of the complaint.

7.2 The person who is the subject of the complaint shall keep the complaints officer informed regarding any contact and a possible solution.

7.3 The complaints officer shall keep the complainant informed regarding the handling of the complaint.

7.4 The complaints officer shall keep the complaint file up to date.

### **8. Complaint registration**

8.1 The complaints officer shall register the complaint including its subject matter.

8.2 A complaint may be subdivided into several subjects.

8.3 The complaints officer shall report periodically on the handling of complaints, and shall make recommendations in order to prevent any new complaints and to improve procedures.

8.4 At least once per year, the reports and recommendations shall be discussed at the office and submitted to a decision.