

COMPLAINTS CODE

Article 1: Definitions

For the purposes of this complaints code, the following definitions apply:

- **Complaint**: any written expression of dissatisfaction by or on behalf of the client vis-à-vis the lawyer or the persons working under his responsibility with regard to the conclusion and performance of a contract for services, the quality of the services or the amount of the fee, not being a Complaint as referred to in paragraph 4 of the Lawyers Act (disciplinary proceedings);
- **Complainant**: the client or his representative who makes a Complaint;
- **Complaints Officer**: the lawyer entrusted with the handling of the Complaint.

Article 2: Scope of application

This complaints procedure applies to all agreements between LOYR and the client. Each lawyer of LOYR is responsible for handling complaints in accordance with this complaints code.

Article 3: Objectives

The purpose of this complaints code is:

- a. the establishment of a code to constructively deal with a Complaint within a reasonable time;
- b. establishing a code to determine the causes of a Complaint;
- c. maintaining and improving existing relationships through proper complaint handling;
- d. train employees to respond to a Complaint in a client-focused manner; and
- e. improving the quality of services by means of complaint handling and complaint analysis.

Article 4: Information upon commencement of service

4.1 This complaints code has been published and placed on the website of LOYR. The lawyer will point out to the client, before or during the conclusion of the contract for services, that the office has a complaints procedure and that this is applicable to the services provided.

4.2 LOYR has included in the general conditions to which independent party or body a complaint that is not resolved after treatment may be submitted to obtain a binding decision and has indicated this in the order confirmation.

4.3 Complaints as referred to in Article 4.2 of this complaints code that have not been resolved after processing shall be submitted to the District Court of Amsterdam.

Article 5: Internal complaint code

5.1 Every Complaint will be forwarded to Mr. F.F.A. Havelaar, who will act as Complaints Officer. If the Complaint concerns Mr. F.F.A. Havelaar himself, the Complaint will be forwarded to Mr. J. van Mens, who will then act as Complaints Officer.

5.2 The Complaints Officer will inform the person complained about of the Complaint and will give the Complainant and the person complained about the opportunity to comment on the Complaint.

5.3 The person complained about shall attempt to reach a solution together with the client, whether or not after intervention by the Complaints Officer.

5.4 The Complaints Officer will handle the Complaint within four weeks of receipt of the Complaint or will notify the Complainant of any deviation from this term and state the reasons why, indicating the term within which a decision will be rendered on the Complaint.

5.5 The Complaints Officer will notify the Complainant and the person complained about in writing of the opinion on the merits of the Complaint, whether or not accompanied by recommendations.

5.6 If the Complaint has been handled satisfactorily, the Complainant, the Complaints Officer and the person complained about will sign the opinion on the merits of the Complaint.

Article 6: Confidentiality and free complaint handling

6.1 The Complaints Officer, the Complainant and the person complained about shall observe confidentiality during the handling of the complaint.

6.2 The Complainant shall not be liable to pay any compensation for the costs of handling the complaint.

Article 7: Responsibilities

7.1 The Complaints Officer is responsible for the timely handling of the Complaint.

7.2 The person complained about shall keep the Complaints Officer informed of any contact and a possible solution.

7.3 The Complaints Officer will keep the Complainant informed about the handling of the Complaint.

7.4 The Complaints Officer will create and maintain a complaint file for the Complaint.

Article 8: Registration of complaints

8.1 The Complaints Officer will register the Complaint and the subject of the Complaint. The Complaints Officer will periodically report on the handling of the Complaint and make recommendations for the prevention of new Complaints, as well as for the improvement of codes.

8.2 At least once a year, the reports and recommendations of the Complaint(s) shall be discussed at the office and submitted for decision.

Version July 2022