

NautaDutilh Complaints Procedure Rules

ARTICLE 1 DEFINITIONS

In the NautaDutilh Complaints Procedure Rules, the following definitions apply:

Rules:

the complaints procedure rules set out below;

Complaint:

any expression of dissatisfaction filed in writing at complaintscommittee@nautadutilh.com by or on behalf of a client of NautaDutilh N.V. regarding the conclusion or performance of a contract for professional services (overeenkomst van opdracht), the quality of the services rendered or the amount billed in an invoice;

Complainant:

the NautaDutilh N.V. client that files a complaint, whether himself/itself or through a representative;

Complaints committee:

the committee set up by the board of NautaDutilh N.V. to register, handle and analyse complaints;

Complaints officer:

the member of the complaints committee charged by that committee with handling the complaint in a specific case.

ARTICLE 2 AIMS

The aims of these Rules are:

1. To lay down a procedure by which complaints can be constructively resolved within a reasonable period of time;
2. To lay down a procedure for establishing the cause(s) of a complaint;
3. To contribute towards maintaining and improving NautaDutilh N.V.'s existing client relationships by handling complaints in a solution-oriented manner;
4. To improve the quality of NautaDutilh N.V.'s services by resolving and analysing complaints.

ARTICLE 3 COMPLAINTS COMMITTEE

The complaints committee set up by the board of NautaDutilh N.V. will consist of at least two members and no more than four members.

ARTICLE 4 INFORMATION UPON THE COMMENCEMENT OF THE PROVISION OF SERVICES

1. These Rules are publicly available on the website of NautaDutilh N.V. Upon the conclusion of a contract for professional services, the relevant lawyer will inform the client that there is a complaints procedure in place within NautaDutilh N.V. and that, as a result of its inclusion in NautaDutilh N.V.'s general terms and conditions, this procedure will apply to the services provided. NautaDutilh N.V.'s general terms and conditions have been filed at the registry of the Rotterdam District Court and appear on NautaDutilh N.V.'s website at www.nautadutilh.com/terms.
2. In its general terms and conditions, NautaDutilh N.V. has specified the independent party or body to whom/which a complaint as defined in Article 1 above that has not been resolved through the procedure provided for under these Rules can be submitted in order to obtain a binding decision. The inclusion of this information in NautaDutilh N.V.'s general terms and conditions constitutes notification, at the time that the firm confirms its engagement for the provision of the relevant professional services, of this information to the client;
3. A complaint that has not been resolved through the procedure provided for under these Rules will be subject to the complaint and dispute resolution rules of the respective professional organisation(s); see www.nautadutilh.com/info for more information. This is notwithstanding the complainant's right to institute civil proceedings before the courts in accordance with the contract for professional services concluded with the complainant and to which NautaDutilh N.V.'s general terms and conditions apply.

ARTICLE 5 THE PROCEDURE

1. Following the receipt of a written complaint submitted by e-mail at complaints@nautadutilh.com the complaints committee will designate a complaints officer from among the committee's members to handle that complaint;
2. The complaints officer will contact the complainant or his/its representative as soon as possible and will also maintain contact with the complainant or his/its representative thereafter;
3. The complaints officer will inform the person(s) against whom the complaint has been made about the filing of the complaint and will give that person/those persons and the complainant an opportunity to give an explanation regarding the complaint;
4. The person(s) against whom the complaint has been made will attempt to reach a solution with the complainant, with or without the intervention of the complaints officer;
5. As soon as possible but in any event within one month following receipt of the complaint at complaints@nautadutilh.com, the complaints officer will notify the person(s) against whom the complaint has been made and the complainant in writing of his/her opinion on the validity of the complaint and the reason(s) for this opinion, possibly accompanied by recommendations;
6. In the event that a written opinion as referred to in Article 5.5 cannot be issued within one month following receipt of the complaint, the complaints officer will, within that period, notify the person(s) against whom the complaint has been made and the complainant in writing of the reason(s) for the delay and of the period within which the opinion will be issued;
7. If the complaint is satisfactorily resolved, the complainant, the complaints officer and the person(s) against whom the complaint was made will sign the opinion on the validity of the complaint;
8. The complaints officer will obtain the advice of a partner at NautaDutilh N.V. who is a member of the profession in question if this is required under the respective professional conduct rules or other rules applicable to civil law notaries/candidate civil law notaries or to tax advisers, or in any event if this is deemed necessary or desirable for the handling of the complaint. In such cases the board may decide, in consultation with the complaints committee, that that partner will temporarily serve as a member of the committee.

ARTICLE 6 SCOPE OF APPLICATION

These Rules apply to complaints against persons working in NautaDutilh N.V.'s offices in the Netherlands, London and New York, subject to the applicable statutory provisions and all professional conduct rules (local or otherwise) applicable to the person(s) in question in respect of the contract for professional services concluded with the complainant.

ARTICLE 7 CONFIDENTIALITY AND COST-FREE HANDLING OF COMPLAINTS

1. The complainant will not be charged any costs for the handling of a complaint under these Rules;
2. The complaints officer and the person(s) against whom the complaint has been made must observe confidentiality regarding the handling of the complaint.

ARTICLE 8 DUTIES

1. The complaints officer is responsible for the timely handling of the complaint;
2. The person(s) against whom the complaint has been made will keep the complaints officer informed regarding any contact with the complainant and possible solutions for the complaint;
3. The complaints officer will keep the complainant informed regarding the handling of the complaint;
4. The complaints officer will maintain the file relating to the complaint.

ARTICLE 9 REGISTRATION AND REPORT OF COMPLAINTS

1. The complaints committee will register each complaint and the subject(s) of that complaint;
2. A complaint can be registered in more than one subject category;
3. The complaints committee will periodically report to the board on the handling of complaints and make recommendations aimed at preventing new complaints and improving the relevant procedures;
4. At least once a year, the reports and recommendations will be discussed and tabled for decision-making purposes within the firm.