

Complaints policy

FirmQ Compliance Services BV (“FCS”) strives for the highest possible level of quality and service. For this reason, it is essential to accept the complaint “unfiltered” and then to resolve the complaint (or have it resolved). For this reason, **FCS** considers complaint management as an essential part of their operation.

1. Policy

1.1 The purpose of the complaints procedure within **FCS** is:

- a. Solving a problem of our client.
- b. Restoring the possibly damaged trust of our client.
- c. Improving our service based on lessons learned.

1.2 This procedure must ensure that complaints are assessed and dealt with properly (in a structured and timely manner).

2. Governance

- 2.1 The Management Team appoints one of the members as the responsible manager for the complaints officer.
- 2.2 The complaints officer develops this Policy, maintains this Policy and is responsible for the implementation of this Policy.
- 2.3 This Policy is adopted by the Management Team and is effective as of the date included on the front page of this Procedures manual.
- 2.4 The complaints officer will evaluate the effectiveness of this Policy at least annually in order to safeguard complaints with the relevant policies of **FCS**. Alterations to this Policy require approval by the Management Team.
- 2.5 The complaints officer may consult, where necessary, external advisors.
- 2.6 This Policy can be amended at all times by a decision of the Management Team.

3. Procedure

- 3.1 The working method for dealing with a complaint:
 - a. A client’s complaints will reach us in practice by the client contacting us by telephone, sending an e-mail, sending an app or via social media, with/to **FCS**.
 - b. After receipt the complaint, the complaint will be registered in the complaints register.
 - c. The complaints officer investigates the merits of the complaint. The results of this investigations will be recorded in the complaints register.
 - d. The complaints officer can handle the complaint independently.

If compensation is deemed necessary or there is potential reputation risk the complaints officer drafts a memo including necessary appendices and screen prints to substantiate the validity of the complaint. In this memo, the complaints officer also gives his opinion on the merits of the complaint and makes a proposal on the handling of the complaint, including how to communicate with the client.

- e. This fully completed memo is submitted, together with the complaints register, to the Management of **FCS**. They will take a decision on the basis of the memo. If desired, the Management Team will ask advice of the compliance officer.

4. Communication with the client:

- 4.1 Within 48 hours (weekends and compulsory days off are not included in this response time) after receipt of the complaint, the complaints officer will contact the client by email or by telephone. He will confirm receipt of the complaint and, if necessary, request clarification of the complaint. During this conversation, the client is also informed that the complaint, if not solved immediately, will be handled within 2 weeks and the client will be contacted within 2 weeks for feedback.
- 4.2 If a complaint is resolved, the complaints officer contacts the client within 3 working days by email or by telephone to inform whether the complaint has been satisfactorily resolved. If deemed necessary the **FCS** management visits the client on site.

5. The complaints register

- 5.1 The following information will be recorded in the complaints register:
 - a. Date of receipt of the complaint.
 - b. Client name, contact details, address, file number.
 - c. Clear description of the complaint.
 - d. Process to which the complaints relates.
 - e. If applicable date of informing the complaints officer.
 - f. Cause of the complaint.
 - g. Date of first reaction **FCS**.
 - h. Date of feedback to the client, including an explanation of what actions will be taken and when the complaint is resolved and when the client is contacted again
 - i. If applicable the decision of the complaints officer and the necessary action.
 - j. Date of final settlement.
 - k. Decision as to which processing has taken place.
 - l. If applicable the amount of compensation.

- m. Date of verification with the client whether the complaint has been resolved properly (service call or site visit).
- n. Improvement point for FCS.

6. Confidentiality

6.1 Staff members who are involved in the handling and recording of complaints must exercise a high level of professionalism and confidentiality.

7. Public information

Information about our complaint's procedure is disclosed on our website:

'FCS does its utmost to always offer you the best service. For this reason, we believe it is important to hear from you as our customer if we have not met your expectations. If you have any matters you would like to present to us again, you can send an email to contact@firm.com Once we have received your feedback, we will contact you by telephone within 48 hours. We will contact you again after two weeks at the latest with regard to the follow-up steps drawn up by us in response to your feedback.

We strive to fully process your feedback and resolve any complaints.'

Den-Haag, 1-4-2022